# PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

# Hayes Lemmerz International - Indiana, Inc. 1870 Riverfork Drive Huntington, Indiana 46750

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T069-7421-00031

Issued by: Original signed by Janet McCabe
Janet G. McCabe, Assistant Commissioner
Office of Air Quality

Issuance Date: April 16, 2002

Expiration Date: April 16, 2007

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# **Compliance Determination Requirements**

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- D.3.1 Particulate Matter [326 IAC 6-3-2(c)]
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- D.3.7 Particulate Matter (PM)
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# Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

- D.3.9 Visible Emission Notations
- D.3.10 Parametric Monitoring
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# Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

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# D.4 FACILITY OPERATION CONDITIONS - Melt Furnace #1, Melt Furnace #2, Melt Furnace #3, Carousel Holding Furnace #1, Carousel Holding Furnace #2, Carousel Holding Furnace #3, Carousel Holding Furnace #4, Carousel Holding Furnace #5, and Carousel Holding Furnace #6

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

- D.4.1 Particulate Matter [326 IAC 6-3-2(c)]
- D.4.2 General Provisions Relating to NESHAP [326 IAC 20-1] [40 CFR 52.21]
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# **Compliance Determination Requirements**

- D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63.1511 and 40 CFR 63.1512]
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# Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.6 Compliance Monitoring Requirements [40 CFR 63.1510, Subpart RRR]

# Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.4.7 Record Keeping Requirements [40 CFR 63.10]
- D.4.8 Reporting Requirements [40 CFR 63.1515] [40 CFR 63.1516]

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D.5.3 Particulate Matter (PM)

Certification Form
Emergency Occurrence Report Form
Quarterly Report Form
Quarterly Deviation and Compliance Monitoring Report Form

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Hayes Lemmerz International - Indiana, Inc. Huntington, Indiana

Permit Reviewer: Felicity L. Lao / AMC

#### **SECTION A**

#### **SOURCE SUMMARY**

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

# A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)] [326 IAC 2-7-1(22)]

The Permittee owns and operates a stationary operation that manufactures aluminum wheels for automobiles and light trucks.

Responsible Official: Rick Guernsey

Source Address: 1870 Riverfork Drive, Huntington, Indiana 46750 Mailing Address: 1870 Riverfork Drive, Huntington, Indiana 46750

General Source Phone Number: (219) 356-7001

SIC Code: 3714
County Location: Huntington

County Status: Attainment for all criteria pollutants

Source Status: Part 70 Permit Program

Minor Source, under PSD;

Major Source, Section 112 of the Clean Air Act

# A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) paint booth, identified as R-30 Color Coat liquid booth, equipped with ten (10) air atomized spray guns, with a maximum capacity to paint 800 aluminum wheels per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-22. (Constructed in 1993)
- (b) One (1) paint line, identified as the R-30 Powder Coat paint line, with two (2) booths, identified as Powder Coat paint booth North and Powder Coat paint booth South, equipped with a total of four (4) electrostatic air atomized spray guns, with a total maximum throughput capacity of 800 wheels per hour, using dry filters for particulate matter control, exhausting indoors with filtered recycling. (Constructed in 1989)
- (c) One (1) paint line, identified as the R-40 Powder Clear Coat paint line, equipped with one (1) electrostatic air atomized spray gun, with a total maximum throughput capacity of 420 wheels per hour, using dry filters for particulate matter control, exhausting indoors with filtered recycling. (Constructed in 1993)
- (d) One (1) 5.2 million Btu per hour natural gas fired thermal chip dryer, with a maximum throughput capacity of 3600 pounds of aluminum per hour, vented to an afterburner furnace (used as fire prevention and not as continuous emissions control), which has a maximum heat input capacity of 7 million Btu per hour, equipped with a chip hopper that is vented to a multicyclone for particulate matter control. The dryer will process in house process scrap/aluminum chips and operate at a temperature of 800 EF, exhausting to one (1) stack, identified as S-53. (Constructed in 1996)

- (e) One (1) 12 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #5, with an associated sidewell furnace, identified as Sidewell Furnace #5 with a combined total maximum throughput of 6000 pounds of aluminum per hour. Sidewell Furnace #5 is permitted to melt in-house process aluminum scrap. Melt Furnace #5 has a maximum throughput of 4500 pounds of clean aluminum/ingots per hour and exhausts to one (1) stack, identified as S-54, with emissions uncontrolled. Sidewell #5 has a maximum throughput of 1500 pounds of in-house process aluminum scrap per hour, is equipped with a multicyclone as control, and exhausts to one (1) stack, identified as S-53. (Constructed in 1996)
- (f) One (1) 12 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #4, with an associated sidewell furnace, identified as Sidewell Furnace #4 and a total maximum throughput of 6000 pounds of aluminum per hour. Sidewell Furnace #4 is permitted to melt in-house process aluminum scrap (and may only do so as a backup for periods when Melt Furnace #5 is not operational in the event of breakdown or failure). Melt Furnace #4 has a maximum throughput of 4500 pounds of clean aluminum per hour and exhausts to one (1) stack, identified as S-43, with emissions uncontrolled. Sidewell #4 has a maximum throughput of 1500 pounds of in-house aluminum scrap per hour, is equipped with a multicyclone as control, and exhausts to one (1) stack, identified as S-53. (Constructed in 1994)
- (g) One (1) 9.2 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #3, with a maximum throughput capacity of 3000 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-04. (Constructed in 1987)
- (h) One (1) 11 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #2, with a maximum throughput capacity of 3500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-05. (Constructed in 1990)
- (i) One (1) 11 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #1, with a maximum throughput capacity of 3500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-06. (Constructed in 1990)
- (j) One (1) carousel holding furnace, identified as Carousel Holding Furnace #1, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 1000 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-09. (Constructed in 1989)
- (k) One (1) carousel holding furnace, identified as Carousel Holding Furnace #2, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 1500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-08. (Constructed in 1987)
- (I) One (1) carousel holding furnace, identified as Carousel Holding Furnace #3, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 1500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-03. (Constructed in 1987)

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- (m) One (1) carousel holding furnace, identified as Carousel Holding Furnace #4, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 1500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-10. (Constructed in 1988)
- (n) One (1) carousel holding furnace, identified as Carousel Holding Furnace #5, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 2500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-32. (Constructed in 1991)
- (o) One (1) carousel holding furnace, identified as Carousel Holding Furnace #6, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 2500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-50. (Constructed in 1994)
- (p) One (1) Electric Infrared powder coating oven, which is part of the 3-stage curing oven used for the R-30 Color Coat liquid booth and the R-30 Powder Coat paint line.
- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

  This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):
  - (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
    - (1) One (1) Dry-Off oven for the R-30 powder and liquid coating lines, with a maximum heat input capacity of 1.43 million Btu per hour, exhausting to one (1) stack, identified as S-11.
    - (2) One (1) 3-stage Curing oven used for the R-30 Color Coat liquid booth and the R-30 Powder Coat paint line, consisting of: one (1) 2-stage Powder Paint cure oven with a maximum heat input capacity of 2.87 million Btu per hour and one (1) Electric Infrared powder coating oven, with a maximum throughput capacity of 800 wheels per hour, exhausting to three (3) stacks, identified as S-12, S-13 and S-14.
    - One (1) Paint Hook Stripping oven, associated with the R-30 Powder Coat paint line, with a maximum heat input capacity of 0.35 million Btu per hour, exhausting to one (1) stack, identified as S-21. [326 IAC 4-2-2]
    - (4) One (1) Heat Treat furnace, identified as HTF-A, with a maximum heat input capacity of 8 million Btu per hour, exhausting to six (6) stacks, identified as S15, S-16, S-17, S-18, S-19 and S-20.
    - One (1) Heat Treat furnace, identified as HTF-B, with a maximum heat input capacity of 6 million Btu per hour, exhausting to six (6) stacks, identified as S-26, S-45, S-46, S-47, S-48 and S-49.
    - (6) One (1) paint line, identified as the R-40 Powder Clear Coat paint line, with:
      - \* One (1) Pretreat Line Stage #2 burner, with a maximum heat input capacity of 2.07 million Btu per hour, exhausting to one (1) stack, identified as S-34.
      - \* One (1) Pretreat Line Stage #3 burner, with a maximum heat input capacity of 1.38 million Btu per hour, exhausting to one (1) stack,

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- identified as S-35.
- \* One (1) Pretreat Line Stage #8 burner, with a maximum heat input capacity of 0.325 million Btu per hour, exhausting to one (1) stack, identified as S-36.
- \* One (1) Dryoff Zone #1 oven, with a maximum heat input capacity of 0.838 million Btu per hour, exhausting to one (1) stack, identified as S-37.
- \* One (1) Dryoff Zone #2 oven, with a maximum heat input capacity of 1.02 million Btu per hour, exhausting to one (1) stack, identified as S-38.
- \* One (1) R-40 Cure oven, with a maximum heat input capacity of 2.78 million Btu per hour, exhausting to one (1) stack, identified as S-39.
- One (1) Rim Heating oven, with a maximum heat input capacity of 0.4 million Btu per hour, exhausting to one (1) stack, identified as S-56.
- (8) One (1) mold coating/repair process with two (2) mold bake ovens, identified as Mold Bake oven North and Mold Bake oven South, each with a maximum heat input capacity of 1.2 million Btu per hour, resulting in fugitive emissions and exhausting indoors at points S-63 and S-64.
- (9) One (1) natural gas-fired in-line heat treat furnace, identified as In-Line Heat Treat Furnace, with a maximum heat input capacity of 6.0 million Btu per hour, exhausting to one (1) stack designated as S-59. (Constructed in 2001)
- (10) One (1) natural gas-fired age oven, with a maximum heat input capacity of one (1) MMBtu/hr, used to heat clean wheels to 300 degrees for aging purposes. The age oven is operated in a batch cycle of 4000 pounds of wheels per batch.
- (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
- (c) Combustion source flame safety purging on startup.
- (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
- (e) The following VOC and HAP storage containers:
  - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
  - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (f) Equipment used exclusively for the following: filling drums, pails or other packaging containers with lubricating oil, waxes, and greases.
- (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
- (h) The following equipment related to manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment.
  - (1) One (1) Robotic auto welder station, used for two piece wheel operation, with a

maximum capacity of two (2) pounds of wire per hour and six hundred eleven (611) pounds per hour of aluminum wheel rims and centers, exhausting to one (1) stack, identified as S-58. (Constructed in 1995; still at the source but currently not in operation) [326 IAC 6-3-2] (Covered under C.1)

- (i) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
  - (1) One (1) Waste Water Treatment consisting of three (3) tanks, with a maximum heat input capacity of 3 million Btu per hour, resulting in fugitive emissions.
- Forced and induced draft cooling tower system not regulated under a NESHAP.
- (k) Quenching operations used with heat treating processes.
- (I) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
- (m) Heat exchanger cleaning and repair.
- (n) Process vessel degassing and cleaning to prepare for internal repairs.
- (o) Paved and unpaved roads and parking lots with public access.[326 IAC 6-4] [326 IAC 6-5]
- (p) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (q) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
- (r) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling tower.
- (s) On-site fire and emergency response training approved by the department.
- (t) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
  - (1) One (1) shotblasting room/booth, with a maximum capacity of 5376 pounds per hour, with one (1) baghouse for particulate matter control, exhausting to one (1) stack, identified as S-33. [326 IAC 6-3-2] (Covered under C.1)
- (u) Filter or coalescer media changeout.
- (v) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius.
- (w) A laboratory as defined in 326 IAC 2-7-4(20)(C).

(x) Other activities or categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only.

Lead (Pb) = 0.6 ton/year or 3.29 lbs/day

Sulfur Dioxide = 5 lbs/hour or 25 lbs/day

Nitrogen Oxides (NOX) = 5 lbs/hr or 25 lbs/day

Volatile Organic Compounds (VOC) = 3 lbs/hr or 15 lbs/day

- (1) Three (3) degassing/flux systems, identified as Degassing/Flux System #1, Degassing Flux System #2, and Degassing/Flux System #3, each with maximum throughput capacities of 40 ladles per shift. The larger ladles have a maximum capacity of 3600 pounds per hour and the smaller ladles have maximum capacities of 2000 pounds per hour (with potential PM10 emissions of 0.62 tons per year). DFS#1 exhausting to one (1) stack identified as S-51, DFS#2 exhausting to one (1) stack, identified as S-55.
- (2) Propane is used as back-up fuel for all natural gas combustion sources.
- One (1) chip wringer that feeds into the natural gas fired thermal chip dryer at a rate of 3600 pounds of aluminum per hour.
- (4) Twelve (12) electric low pressure aluminum wheel casting units, each with a maximum design throughput of 60 wheels per hour. (Six (6) constructed in 2001) (Six (6) constructed in 2002)

# A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 Applicability).

#### **SECTION B**

#### **GENERAL CONDITIONS**

# B.1 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2 and 326 IAC 2-7) shall prevail.

# B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

# B.3 Enforceability [326 IAC 2-7-7]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

# B.4 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

# B.5 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

# B.6 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort or any exclusive privilege.

# B.7 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)] [326 IAC 2-7-6(6)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality. [326 IAC 2-7-5(6)(E)]

(c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

# B.8 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (2) Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act.
- (c) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (d) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

#### B.9 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

# B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

# B.11 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each facility:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The PMP and the PMP extension notification do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

#### B.12 Emergency Provisions [326 IAC 2-7-16]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered:

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section), or

Telephone Number: 317-233-5674 (ask for Compliance Section)

Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management

Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(10) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
- (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

# B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(a) Pursuant to 326 IAC 2-7-15, the Permittee has been granted a permit shield. The permit shield provides that compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that either the applicable requirements are included and specifically identified in this permit or the permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable. The Indiana statutes from IC 13 and rules from 326 IAC, referenced in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7 or for applicable requirements for which a permit shield has been granted.

This permit shield does not extend to applicable requirements which are promulgated after the date of issuance of this permit unless this permit has been modified to reflect such new requirements.

- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (c) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (d) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (e) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (f) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (g) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

#### B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated
  - (2) revised; or
  - (3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

# B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

# B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)] The notification by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

# B.17 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3] If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)] If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

# B.18 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

- (a) Permit amendments and modifications are governed by the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

# B.19 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

# B.20 Operational Flexibility [326 IAC 2-7-20] [326 IAC 2-7-10.5]

- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:
  - (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
  - (2) Any preconstruction approval required by 326 IAC 2-7-10.5 has been obtained;
  - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
  - (4) The Permittee notifies the:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance

- of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and
- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.
  - Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).
- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a). For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (1) A brief description of the change within the source;
  - (2) The date on which the change will occur;
  - (3) Any change in emissions; and
  - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted is not considered an application form, report or compliance certification. Therefore, the notification by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) Emission Trades [326 IAC 2-7-20(c)]
  The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]

  The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- B.21 Source Modification Requirement [326 IAC 2-7-10.5]

A modification, construction, or reconstruction is governed by 326 IAC 2 and 326 IAC 2-7-10.5.

# B.22 Inspection and Entry [326 IAC 2-7-6] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy any records that must be kept under the conditions of this

permit;

- (c) Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

# B.23 Transfer of Ownership or Operational Control [326 IAC 2-7-11]

- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management Permits Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

# B.24 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ, the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

#### **SECTION C**

#### **SOURCE OPERATION CONDITIONS**

#### **Entire Source**

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

# C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

# C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

#### C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

#### C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

# C.6 Operation of Equipment [326 IAC 2-7-6(6)]

Except as otherwise provided by statute or rule, or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit(s) vented to the control equipment are in operation.

# C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

# C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
  The Permittee shall comply with the applicable emission control procedures in 326 IAC
  14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements
  are applicable for any removal or disturbance of RACM greater than three (3) linear feet
  on pipes or three (3) square feet on any other facility components or a total of at least
  0.75 cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The

requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

# Testing Requirements [326 IAC 2-7-6(1)]

# C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

# Compliance Requirements [326 IAC 2-1.1-11]

#### C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

# C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Unless otherwise specified in the approval for the new emission unit(s), compliance monitoring for new emission units or emission units added through a source modification shall be implemented when operation begins.

# C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less often than once an hour until such time as the continuous monitor is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

# C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

- C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]
  - (b) Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.
  - (b) Whenever a condition in this permit requires the measurement of a temperature, flow rate, or pH level, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.
  - (c) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

# Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

# C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with

safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management Compliance Branch, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

#### C.16 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP)

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

# C.17 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of the notification.
  - (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.
- C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]
  - (a) When the results of a stack test performed in conformance with Section C -Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
  - (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
  - (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

# Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- C.19 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
  - (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
    - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
    - (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.
  - (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:

Indiana Department of Environmental Management Technical Support and Modeling Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

# C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

# C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P. O. Box 6015 Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

# **Stratospheric Ozone Protection**

# C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

#### SECTION D.1 FACILITY OPERATION CONDITIONS

# Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) paint booth, identified as R-30 Color Coat liquid booth, equipped with ten (10) air atomized spray guns, with a maximum capacity to paint 800 aluminum wheels per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-22. (Constructed in 1993)
- (b) One (1) paint line, identified as the R-30 Powder Coat paint line, with two (2) booths, identified as Powder Coat paint booth North and Powder Coat paint booth South, equipped with a total of four (4) electrostatic air atomized spray guns, with a total maximum throughput capacity of 800 wheels per hour, using dry filters for particulate matter control, exhausting indoors with filtered recycling. (Constructed in 1989)
- (c) One (1) paint line, identified as the R-40 Powder Clear Coat paint line, equipped with one (1) electrostatic air atomized spray gun, with a total maximum throughput capacity of 420 wheels per hour, using dry filters for particulate matter control, exhausting indoors with filtered recycling. (Constructed in 1993)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Miscellaneous Metal Coating Operations [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9, no owner or operator of a facility engaged in the surface coating of aluminum wheels may cause, allow, or permit the discharge into the atmosphere of any volatile organic compounds in excess of 3.5 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator, for forced warm air dried coatings.
- (b) Pursuant to 326 IAC 8-2-9, solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

# D.1.2 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the one (1) paint booth, identified as R-30 Color Coat liquid booth, the one (1) paint line, identified as the R-30 Powder Coat paint line, and the one (1) paint line, identified as the R-40 Powder Clear Coat paint line, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

# D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the above listed emission units and any control devices.

# **Compliance Determination Requirements**

# D.1.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

# D.1.5 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent month.

# Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.1.6 Particulate Matter (PM)

In order to comply with D.1.2, the dry filters for PM control shall be in operation and control emissions from the one (1) paint booth, identified as R-30 Color Coat liquid booth, the one (1) paint line, identified as the R-30 Powder Coat paint line, and the one (1) paint line, identified as the R-40 Powder Clear Coat paint line at all times when the booths/lines are in operation.

#### D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the R-30 Color Coat liquid booth's stack, S-22 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Response Plan Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other noticeable change in overspray emissions is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Response Plan Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

# Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

# D.1.8 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The volume weighted VOC content of the coatings used for each day that any coating with VOC content greater than 3.5 pounds per gallon is used, by:

Dc = density of coating, lb/gal
O = weight percent organics, %
W = percent volume of water, %

Dw = density of water, lb/gal
Q = quantity of coating, gal/unit
C = total of coatings used, gal/unit

- (4) The cleanup solvent usage for each month;
- (5) The total VOC usage for each month; and
- (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

# D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

#### SECTION D.2 FACILITY OPERATION CONDITIONS

# Facility Description [326 IAC 2-7-5(15)]:

(a) One (1) 5.2 million Btu per hour natural gas fired thermal chip dryer, with a maximum throughput capacity of 3600 pounds of aluminum per hour, vented to an afterburner furnace (used as fire prevention and not as continuous emissions control), which has a maximum heat input capacity of 7 million Btu per hour, equipped with a chip hopper that is vented to a multicyclone for particulate matter control. The dryer will process in house process scrap/aluminum chips and operate at a temperature of 800 EF, exhausting to one (1) stack, identified as S-53. (Constructed in 1996)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

# Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 General Reduction Requirements for New Facilities and Prevention of Significant Deterioration [326 IAC 8-1-6] [326 IAC 2-2] [40 CFR 52.21]

Pursuant to CP No. 069-4665-00031, issued on October 26, 1995, the input coolant on the aluminum chips to the chip dryer shall be limited to 54 pounds per hour. This production limitation is equivalent to twelve (12) tons of VOC per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOCs to less than 25 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 and also 326 IAC 2-2 (Prevention of Significant deterioration) not applicable.

- D.2.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

  The provisions of 40 CFR Part 63, Subpart A General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the natural gas fired thermal chip dryer except when otherwise specified in 40 CFR Part 63, Subpart RRR.
- D.2.3 Emission Standards and Operating Requirements [40 CFR 63.1505, 40 CFR 63.1506, Subpart RRR]
  - (a) Pursuant to 40 CFR 63.1505(c), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the owner or operator of a thermal chip dryer must not discharge or cause to be discharged to the atmosphere emissions in excess of:
    - (1) 0.40 kilograms (kg) of THC, as propane, per megagram (Mg) (0.80 lb of THC, as propane, per ton) of feed/charge from a thermal chip dryer at a secondary aluminum production facility that is a major source; and
    - (2) 2.50 micrograms (Fg) of D/F TEQ per Mg (3.5 x 10<sup>-5</sup>gr per ton) of feed/charge from a thermal chip dryer at a secondary aluminum production facility that is a major or area source.
  - (b) Pursuant to 40CFR 63.1506, on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the owner or operator must operate the thermal chip dryer and control equipment according to the requirements in this section.
    - (1) Pursuant to 40 CFR 63.1506(c), the owner or operator of the thermal chip dryer/multicyclone must:

- (A) Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice" (incorporated by reference in 40 CFR 63.1502 of this subpart)
- (B) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and
- (C) Operate each capture/collection system according to the procedures and requirements in the OM&M plan.
- (2) Pursuant to 40 CFR 63.1506(d), the owner or operator of the thermal chip dryer must:
  - (A) Except as provided in paragraph (C) of this section, install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test; and
  - (B) Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
  - (C) The owner or operator may choose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that:
    - (i) The aluminum production weight, rather than feed/charge weight is measured and recorded for the thermal chip dryer; and
    - (ii) All calculations to demonstrate compliance with the emission limits for thermal chip dryer are based on aluminum production weight rather than feed/charge/weight.
- (3) Pursuant to 40 CFR 63.1506(p), when a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the owner or operator must initiate corrective action. Corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.

# D.2.4 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to CP No. 069-4665-00031, issued on October 26, 1995 and 326 IAC 6-3-2, the allowable PM emissions from the thermal chip dryer shall not exceed 6.08 pounds per hour when operating at a process weight rate of 1.8 tons per hour.

Hayes Lemmerz International - Indiana, Inc. Huntington, Indiana

Permit Reviewer: Felicity L. Lao / AMC

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where  $E =$  rate of emission in pounds per hour; and  $P =$  process weight rate in tons per hour

# D.2.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for the thermal chip dryer and the multicyclone.

#### D.2.6 Alternative Operating Scenario

The thermal chip dryer is allowed a maximum throughput capacity of 6000 pounds per hour, even though the maximum design throughput capacity of the pneumatic chip handling system being conveyed to the melt furnaces is only 3600 pounds per hour. This is to account for times when there is a surplus of chips that have already been dried and are backlogged, but have not been fed to the melt furnaces.

# **Compliance Determination Requirements**

- D.2.7 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63.1511 and 40 CFR 63.1512]
  - (a) Within 180 days after the issuance of this permit, in order to demonstrate compliance with Condition D.2.3, the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.
  - (b) The owner or operator of a thermal chip dryer is subject to the performance test/compliance demonstration general requirements and procedures as listed in 40 CFR 63.1511.
  - (c) Pursuant to 40 CFR 63.1512(b), the owner or operator of a thermal chip dryer must conduct a performance test to measure THC and D/F emissions at the outlet of the control device while the unit processes only unpainted aluminum chips.
  - (d) Pursuant to 40 CFR 63.1512(k), the owner or operator of a thermal chip dryer subject to an emission limit in a kg/Mg (lb/ton) of feed/charge format must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the thermal chip dryer instead of the feed/charge weight.
  - (e) Pursuant to 40 CFR 63.1512(s), the owner or operator of a thermal chip dryer/multicyclone must submit the information described in 40 CFR 63.1515(b)(2) as part of the notification of compliance status report to document compliance with the operational standard in 40 CFR 63.1506(c).

#### D.2.8 Equations for Determining Compliance [40 CFR 63.1513]

The owner or operator of the thermal chip dryer must use the equations listed in 40 CFR 63.1513 in order to determine compliance with the applicable emission limits in Condition D.2.3.

#### D.2.9 Particulate Matter (PM)

Pursuant to CP No. 069-4665-00031, issued on October 26, 1995, the multicyclone for PM control shall be in operation at all times when the thermal chip dryer is in operation.

# D.2.10 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

#### D.2.11 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the month, twelve (12) month period).

# Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.2.12 Visible Emissions Notations

- (a) Daily visible emission notations of the thermal chip dryer/multicyclone stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### D.2.13 Parametric Monitoring

The Permittee shall record the total static pressure drop across the multicyclone used in conjunction with the thermal chip dryer, at least once per shift when the thermal chip dryer is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.2.14 Cyclone Inspections

An inspection shall be performed each calender quarter of the multicyclone controlling the thermal chip dryer when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

# D.2.15 Cyclone Failure Detection

In the event that multicyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

# D.2.16 Compliance Monitoring Requirements [40 CFR 63.1510, Subpart RRR]

- (a) Pursuant to 40 CFR 63.1510(b), the owner or operator must prepare and implement for the thermal chip dryer, a written operation, maintenance and monitoring (OM&M) plan. Any subsequent changes to the plan must be submitted to the applicable permitting authority for review and approval. Pending approval by the applicable permitting authority of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. Each plan must contain the following information:
  - (1) Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
  - (2) A monitoring schedule for each affected source and emission unit.
  - (3) Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
  - (4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
    - (A) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions: and
    - (B) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of this part.
  - (5) Procedures for monitoring process and control device parameters, including the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
  - (6) Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in paragraph (5)(A) of this section, including:

- (A) Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and
- (B) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
- (7) A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- (b) Pursuant to 40 CFR 63.1510(d), the owner or operator must install, operate, and maintain a capture/collection system for the thermal chip dryer; and inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in 40 CFR 63.1506 (c) and record the results of each inspection.
- (c) Pursuant to 40 CFR 63.1510(e), the owner or operator of the thermal chip dryer must install, calibrate, operate and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the thermal chip dryer over the same operating cycle or time period used in the performance test. As an alternative to a measurement device, the owner or operator may use a procedure acceptable to IDEM, OAQ to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.
  - (1) The accuracy of the weight measurement device or procedure must be ±1 percent of the weight being measured. The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.
  - (2) The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified in by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.

# Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

# D.2.17 Record Keeping Requirements [40 CFR 63.10]

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.
  - (1) The amount and VOC content of the input coolant used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the input coolant used for each month.
  - (4) The total VOC usage for each month; and

- (5) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.2.12, the Permittee shall maintain records of visible emission notations of the thermal chip dryer/multicyclone stack exhaust once per shift
- (c) To document compliance with Condition D.2.13, the Permittee shall maintain the following:
  - Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle operation.
- (d) To document compliance with Condition D.2.14, the Permittee shall maintain records of the results of the inspections required under Condition D.2.14 and the dates the vents are redirected.
- (e) To document compliance with Condition D.2.3 and D.2.16, as required by 40 CFR 63.10(b), the owner or operator shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.
  - (1) The owner or operator must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.
  - (2) The owner or operator may retain records on microfilm, computer disks, magnetic tape, or microfiche; and
  - (3) The owner or operator may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
  - (4) In addition to the general records required by 40 CFR 63.10(b), the owner or operator of the thermal chip dryer must maintain records of:
    - (A) feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.
    - (B) all charge materials
    - (C) annual inspections of emission capture/collection and closed vent systems
    - (D) any approved alternative monitoring or test procedure.
    - (E) current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
      - (i) startup, shutdown, and malfunction plan;

# (ii) OM&M plan;

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.2.18 Reporting Requirements [40 CFR 63.1515] [40 CFR 63.1516]

- (a) A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the address listed in Section C General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (b) Pursuant to 40 CFR 63.1515(a) and as required by 40 CFR 63.9 (b)(5), the owner or operator must submit initial notifications to IDEM, OAQ. If the owner or operator intends to construct a new affected source or reconstruct a source such that it becomes subject to this subpart, notification must be provided of the intended construction or reconstruction. The notification must include all the information required for an application for approval of construction or reconstruction as required by 40 CFR 63.5(d). For major sources, the application for approval of construction or reconstruction may be used to fulfill these requirements.
  - (1) The application must be submitted as soon as practicable before the construction or reconstruction is planned to commence (but no sooner than the effective date) if the construction or reconstruction commences after the effective date of this subpart; or
  - (2) The application must be submitted as soon as practicable before startup but no later than 90 days after the effective date of this subpart if the construction or reconstruction had commenced and initial startup had not occurred before the effective date.
  - As required by 40 CFR 63.9 (e) and (f), the owner or operator must provide notification of the anticipated date for conducting the performance tests and visible emission observations. The owner or operator must notify the administrator of the intent to conduct a performance test at least 69 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.
- (c) Pursuant to 40 CFR 63.1515(b), each owner or operator must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in the paragraphs (c)(1) through (5) of this section. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. In a State with an approved operating permit program where delegation of authority under section 112(I) of the CAA has not been requested or approved, the owner or operator must provide duplicate notification to the applicable Regional Administrator. If an owner or operator submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:

- (1) All information required in 40 CFR 63.9(h). The owner or operator must provide a complete performance test report for the thermal chip dryer/multicyclone. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
- (2) The compliant operating parameter value or range established with supporting documentation and a description of the procedure used to establish the value (e.g., lime injection rate, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.
- (3) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in 40 CFR 63.1506(c).
- (4) Approved OM&M plan
- (5) Startup, shutdown, and malfunction plan, with revisions.
- (d) Pursuant to 40 CFR 63.1516(a), the owner or operator must develop and implement a written plan as described in 40 CFR 63.6(e)(3)that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The owner or operator shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:
  - (1) Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
  - (2) Corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
- (e) Pursuant to 40 CFR 63.1516(b) and as required by 40 CFR 63.10 (e), the owner or operator must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the reporting period.
  - (1) A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - (A) An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
    - (B) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).

- (C) The thermal chip dryer/multicyclone was not operated according to the requirements of this subpart.
- (2) Each report must include this certification: "Only unpainted aluminum chips were used as feedstock in any thermal chip dryer during this reporting period."
- (3) The owner or operator must submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.
- (f) Pursuant to 40 CFR 63.1516(c) and as required by 40 CFR part 70 or 71, for the purpose of annual certifications of compliance, the owner or operator must certify continuing compliance based upon, but not limited to, the following conditions:
  - (a) Any period of excess emissions, as defined in paragraph (e)(1) of this section, that occurred during the year were reported as required by this subpart; and
  - (b) All monitoring, recordkeeping, and reporting requirements were met during the year.

#### **SECTION D.3**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-7-5(15)]

- (a) One (1) 12 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #5, with an associated sidewell furnace, identified as Sidewell Furnace #5 and a total maximum throughput of 6000 pounds of aluminum per hour. Sidewell Furnace #5 is permitted to melt in-house process aluminum scrap. Melt Furnace #5 has a maximum throughput of 4500 pounds of clean aluminum/ingots per hour and exhausts to one (1) stack, identified as S-54, with emissions uncontrolled. Sidewell #5 has a maximum throughput of 1500 pounds of in-house process aluminum scrap per hour, is equipped with a multicyclone as control, and exhausts to one (1) stack, identified as S-53. (Constructed in 1996)
- (b) One (1) 12 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #4, with an associated sidewell furnace, identified as Sidewell Furnace #4 and a total maximum throughput of 6000 pounds of aluminum per hour. Sidewell Furnace #4 is permitted to melt in-house process aluminum scrap (and may only do so as a backup for periods when Melt Furnace #5 is not operational in the event of breakdown or failure). Melt Furnace #4 has a maximum throughput of 4500 pounds of clean aluminum per hour and exhausts to one (1) stack, identified as S-43, with emissions uncontrolled. Sidewell #4 has a maximum throughput of 1500 pounds of in-house aluminum scrap per hour, is equipped with a multicyclone as control, and exhausts to one (1) stack, identified as S-53. (Constructed in 1994)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) Pursuant to CP No. 069-4665-00031, issued on October 26, 1995, (A069-5245-00031, issued on February 9, 1996) and 326 IAC 6-3-2, the allowable PM emissions from Melt Furnace #5 shall not exceed 6.52 pounds per hour when operating at a process weight rate of 2.00 tons per hour. Pursuant to 326 IAC 6-3-2, the allowable PM emissions from Melt Furnace #4 shall not exceed 6.52 pounds per hour when operating at a process weight rate of 2.00 tons per hour. The pound per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour:

E = 4.10 P 0.67 where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

(b) Pursuant to CP No. 069-4665-00031, issued on October 26, 1995, (A069-5245-00031, issued on February 9, 1996) and 326 IAC 6-3, the allowable PM emissions from Sidewell Furnace #5 shall not exceed 3.38 pounds per hour when operating at a process weight rate of 0.75 tons per hour. Pursuant to 326 IAC 6-3, the allowable PM emissions from Sidewell Furnace #4 shall not exceed 3.38 pounds per hour when operating at a process weight rate of 0.75 tons per hour. The pound per hour limitation was calculated with the following equation.

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour:

E = 4.10 P 0.67 where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

- D.3.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A]

  The provisions of 40 CFR Part 63, Subpart A General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5, except when otherwise specified in 40 CFR Part 63, Subpart RRR.
- D.3.3 Emission Standards and Operating Requirements [40 CFR 63.1505, 40 CFR 63.1506, Subpart RRR]
  - (a) Pursuant to 40 CFR 63.1505(i),
    - (1) The owner or operator of Melt Furnace #4 and Melt Furnace #5 must use the following limits to determine the emission standards for a secondary aluminum processing unit (SAPU):
      - (A) 0.40 kg of PM per Mg (0.80 lb of PM per ton) of feed/charge
      - (B) 15 Fg of D/F TEQ per Mg (2.1 x 10<sup>-4</sup> gr of D/F TEQ per ton) of feed/charge. This limit does not apply if the furnace processes only clean charge; and
      - (C) 0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed/charge
      - (D) The owner or operator may determine the emission standards for Melt Furnace #4 and Melt Furnace #5 by applying the limits on the basis of the aluminum production weight in each furnace, rather than on the basis of feed/charge.
    - (2) The owner or operator of Sidewell Furnace #4 and Sidewell Furnace #5 (that conducts reactive fluxing (except for cover flux) in the hearth, or that conducts reactive fluxing in the sidewell at times when the level of molten metal falls below the top of the passage between the sidewell and the hearth) must comply with the emission limits below on the basis of the combined emissions from the sidewell and the hearth:
      - (A) 0.02 kg of HCl per Mg (0.04 lb of HCl per ton) of feed/charge
      - (B) 0.005 kg of PM per Mg (0.01 lb of PM per ton) of feed/charge
      - (C) 15 Fg of D/F TEQ per Mg (2.1 x 10-4 gr of D/F TEQ per ton) of feed/charge. This limit does not apply if the furnace processes only clean charge
      - (D) The emission limits listed above do not apply to the sidewell furnaces if they use no reactive flux materials

- (E) The owner or operator may determine the emission standards for Sidewell Furnace #4 and Sidewell Furnace #5 by applying the limits on the basis of the aluminum production weight in each furnace, rather than on the basis of feed/charge.
- (b) On and after the date of approval of the operation, maintenance and monitoring (OM&M) plan, the owner or operator must comply with the emission limits calculated using the equations for PM, HCl, and D/F listed in 40 CFR 63.1505(k) for Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5.
- (c) Pursuant to 40 CFR 63.1506(a), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the owner or operator must operate Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 and control equipment according to the requirements in this section. The completion of the initial performance tests for Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5, shall be considered to be the date of approval of the OM&M plan by the permitting authority.
- (d) The owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 must:
  - (1) Pursuant to 40 CFR 63.1506(b), provide and maintain easily visible labels posted at each furnace that identifies the applicable emission limits and means of compliance, including:
    - (A) The type of affected source or emission unit (e.g. group 1 furnace, sidewell furnace)
    - (B) The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and additional practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.
  - (2) Pursuant to 40 CFR 63.1506(d), except as provided in Condition D.3.3 (d)(2) (C) of this section.
    - (A) Install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test; and
    - (B) Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
    - (C) The owner or operator may choose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that:
      - (i) The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units; and

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- (ii) All calculations to demonstrate compliance with the emission limits are based on aluminum production weight rather than feed/charge/weight.
- (3) Pursuant to 40 CFR 63.1506(p), When a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the owner or operator must initiate corrective action. Corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.
- (e) Pursuant to 40 CFR 63.1506(n), the owner or operator of Melt Furnace #4 and Melt Furnace #5 must::
  - (1) Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.
  - (2) Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.
  - (3) Operate each furnace using only clean charge as the feedstock.
- (f) Pursuant to 40 CFR 63.1506(c), the owner or operator of Sidewell Furnace #4 and Sidewell Furnace #5 must:
  - (1) Design and install a system for the capture and collection of emissions to meet the engineering standards for minimum exhaust rates as published by the American Conference of Governmental Industrial Hygienists in chapters 3 and 5 of "Industrial Ventilation: A Manual of Recommended Practice" (incorporated by reference in 40 CFR 63.1502 of this subpart)
  - (2) Vent captured emissions through a closed system, except that dilution air may be added to emission streams for the purpose of controlling temperature at the inlet to a fabric filter; and
  - (3) Operate each capture/collection system according to the procedures and requirements in the OM&M plan.
- (g) Pursuant to 40 CFR 63.1506(m)(6), the owner or operator of Sidewell Furnace #4 and Sidewell Furnace #5 must:
  - (1) Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.
  - (2) Operate each sidewell furnace such that:

- (A) The level of molten metal remains above the top of the passage between the sidewell and hearth during reactive flux injection, unless the hearth also is equipped with an add-on control device.
- (B) Reactive flux is added only in the sidewell unless the hearth is also equipped with an add-on control device.

# D.3.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for Sidewell Furnace #4 and Sidewell Furnace #5 and the multicyclone.

#### D.3.5 Alternative Operating Scenario

Sidewell Furnace #4 is allowed to melt in-house process aluminum scrap, at the same listed capacities as Sidewell Furnace #5--only as a backup for periods when Melt Furnace #5/Sidewell Furnace #5 is not operational due to breakdown or failure..

#### **Compliance Determination Requirements**

- D.3.6 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63.1511 and 40 CFR 63.1512]
  - (a) Within 180 days after the issuance of this permit, in order to demonstrate compliance with Condition D.3.1, the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.
  - (b) The owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 is subject to the performance test/compliance demonstration general requirements and procedures as listed in 40 CFR 63.1511.
  - (c) Pursuant to 40 CFR 63.1512(d)(4), the owner or operator of Sidewell Furnace #4 and Sidewell Furnace #5 that conducts reactive fluxing (except for cover flux) in the hearth, or that conducts reactive fluxing in the sidewell at times when the level of molten metal falls below the top of the passage between the sidewell and the hearth, must conduct performance tests to measure emissions of PM and D/F at the outlet of the control device and emissions of HCl at the outlet (for the emission limit) or the inlet and the outlet (for the percent reduction standard).
  - (d) Pursuant to 40 CFR 63.1512(e) and the site specific monitoring plan required by 40 CFR 63.1510(o), the owner or operator of Melt Furnace #4 and Melt Furnace #5 must include data and information demonstrating compliance with the applicable emission limits below:
    - (1) If Melt Furnace #4 and/or Melt Furnace #5 processes material other than clean charge, the owner or operator must conduct emission tests to measure emissions of PM, HCl, and D/F at the furnace exhaust outlet.
    - (2) If Melt Furnace #4 and/or Melt Furnace #5 processes only clean charge, the owner or operator must conduct emission tests to simultaneously measure emissions of PM and HCl at the furnace exhaust outlet. A D/F test is not required. Each test must be conducted while the melt furnaces process only clean charge.

- (3) The owner or operator may choose to determine the rate of reactive flux added to the melt furnaces and assume, for the purposes of demonstrating compliance with the emission limits, that all reactive flux added to the melt furnaces is emitted. Under these circumstances, the owner or operator is not required to conduct an emission test for HCI.
- (e) Pursuant to 40 CFR 63.1512(j), the owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 must conduct performance tests as described in this section. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and Fg TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for each group 1 furnace processing only clean charge to measure emissions of PM and/or each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either::
  - (1) Emissions of HCI (for the emission limit) or
  - (2) The mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard)
- (f) Pursuant to 40 CFR 63.1512(k), during the emission test(s) conducted to determine compliance with emission limits in a kg/Mg (lb/ton) format, the owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5, subject to an emission limit in a kg/Mg (lb/ton) of feed/charge format must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the thermal chip dryer instead of the feed/charge weight.
- (g) Pursuant to 40 CFR 63.1512(o), the owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5, must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
  - (1) Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during the HCl and D/F tests, determine and record the 15-minute block average weights, and calculate and record the total weight of the gaseous or liquid reactive flux for the 3 test runs;
  - (2) Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs;
  - (3) Determine the total reactive chlorine flux injection rate by adding the recorded measurement of the total weight of chlorine in the gaseous or liquid reactive flux injected and the total weight of chlorine in the solid reactive flux using the following equation:

Hayes Lemmerz International - Indiana, Inc. Huntington, Indiana

Permit Reviewer: Felicity L. Lao / AMC

Where,

W<sub>t</sub> = total chlorine usage, by weight

 $F_1$  = fraction of gaseous or liquid flux that is chlorine

 $W_1$  = weight of reactive flux gas injected;

 $F_2$  = fraction of solid reactive chloride flux that is chlorine

(e.g., F = 0.75 for magnesium chloride); and

 $W_2$  = weight of solid reactive flux;

- (4) Divide the weight of total chlorine usage (W<sub>t</sub>) for the 3 test runs; and
- (5) If a solid reactive flux other than magnesium chloride is used, the owner or operator must derive the appropriate proportion factor subject to approval by IDEM, OAQ.
- (h) Pursuant to 40 CFR 63.1512(s), the owner or operator of Sidewell Furnace #4 and/or Sidewell Furnace #5 and the multicyclone must submit the information described in 40 CFR 63.1515(b)(2) as part of the notification of compliance status report to document compliance with the operational standard in 40 CFR 63.1506(c).

# D.3.7 Particulate Matter (PM)

Pursuant to CP No. 069-4665-00031, issued on October 26, 1995, the multicyclone for PM control shall be in operation at all times when Sidewell Furnace #4 and Sidewell Furnace #5 are in operation.

#### D.3.8 Equations for Determining Compliance [40 CFR 63.1513]

- (a) The owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 must use the equations listed in 40 CFR 63.1513 in order to determine compliance with the applicable emission limits in Condition D.3.3.
- (b) The owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 must use the equation listed in 40 CFR 63.1510(t) in order to calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each SAPU on a daily basis as required in Condition D.3.3(b) pursuant to 40 CFR 63.1505(k).

### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.3.9 Visible Emissions Notations

- (a) Daily visible emission notations of the sidewell furnaces/multicyclone stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### D.3.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the multicyclone used in conjunction with the sidewell furnaces, at least once per shift when Sidewell Furnace #4 and/or Sidewell Furnace #5 is in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.3.11 Cyclone Inspections

An inspection shall be performed each calender quarter of the multicyclone controlling Sidewell Furnace #4 and/or Sidewell Furnace #5 when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.

#### D.3.12 Cyclone Failure Detection

In the event that multicyclone failure has been observed:

Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

#### D.3.13 Compliance Monitoring Requirements [40 CFR 63.1510, Subpart RRR]

- (a) Pursuant to 40 CFR 63.1510(b), the owner or operator must prepare and implement for Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5, a written operation, maintenance and monitoring (OM&M) plan. Any subsequent changes to the plan must be submitted to the applicable permitting authority for review and approval. Pending approval by the applicable permitting authority of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. Each plan must contain the following information:
  - (1) Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
  - (2) A monitoring schedule for each affected source and emission unit.

- (3) Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
- (4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
  - (A) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and
  - (B) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of this part.
- (5) Procedures for monitoring process and control device parameters, including the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
- (6) Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in paragraph (5)(A) of this section, including:
  - (A) Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and
  - (B) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
- (7) A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- (8) Pursuant to 40 CFR 63.1510(s), the owner or operator must include within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
  - (A) The identification of each emission unit in the secondary aluminum processing unit;
  - (B) The specific control technology or pollution prevention measure to be used for each emission unit in the secondary aluminum processing unit and the date of its installation or application;
  - (C) The emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance witheach applicable emission limit'
  - (D) Information and data demonstrating compliance for each emission unit with all applicable design, equipment, work practice or operational standards of this subpart; and

- (E) The monitoring requirements applicable to each emission unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average using the procedure in 40 CFR 63.1510(t). As an alternative to the procedures of 40 CFR 63.1510(t), an owner or operator may demonstrate, through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit.
- (9) Pursuant to 40 CFR 63.1510(s), the SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:
  - (A) Any averaging among emissions of differing pollutants;
  - (B) The inclusion of any affected sources other than emission units in a secondary aluminum processing unit;
  - (C) The inclusion of any emission unit while it is shutdown; or
  - (D) The inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- (10) To revise SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the owner or operator must submit a request to IDEM, OAQ containing the information required by paragraph (8) of this section and obtain approval from IDEM, OAQ prior to implementing any revisions.
- (b) Pursuant to 40 CFR 63.1510(c), the owner or operator must inspect the labels for Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 at least once per calendar month to confirm that posted labels as required by the operational standard in Condition D.3.3(b)(2)(A) are intact and legible.
- (c) Pursuant to 40 CFR 63.1510(d), the owner or operator must install, operate, and maintain a capture/collection system for Sidewell Furnace #4 and Sidewell Furnace #5; and inspect each capture/collection and closed vent system at least once each calendar year to ensure that each system is operating in accordance with the operating requirements in 40 CFR 63.1506(c) and record the results of each inspection.
- (d) Pursuant to 40 CFR 63.1510(e), the owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 must install, calibrate, operate and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the sidewell furnaces over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit basis. As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.

- (1) The accuracy of the weight measurement device or procedure must be ±1 percent of the weight being measured. The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.
- (2) The owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified in by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.
- (e) Pursuant to 40 CFR 63.1510(j), the owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 must:
  - (1) Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emission unit.
    - (A) The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.
    - (B) The accuracy of the weight measurement device must be ±1 percent of the weight of the reactive component of the flux being measured. The owner or operator may apply to the permitting authority for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of ±1 percent impracticable. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standards.
    - (C) Verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.
  - (2) Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
  - (3) Record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
    - (A) Gaseous or liquid reactive flux other than chlorine; and
    - (B) Solid reactive flux.
  - (4) Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).

- (5) The owner or operator may apply to IDEM, OAQ for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.
- (f) Pursuant to 40 CFR 63.1510(n), the owner or operator of Sidewell Furnace #4 and Sidewell Furnace #5 must:
  - (1) Record in an operating log for each charge of a sidewell furnace that the level of molten metal was above the top of the passage between the sidewell and hearth during reactive flux injection, unless the furnace hearth was also equipped with an add-on control device.
  - (2) Submit a certification of compliance with the operational standards in Condition D.3.3(g) for each six (6) month reporting period. Each certification must contain the information in 40 CFR 63.1516 (b)(2)(iii).
- (g) Pursuant to 40 CFR 63.1510(o), the owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 must develop, in consultation with IDEM, OAQ, a written site-specific monitoring plan. The site-specific monitoring plan must be part of the OM&M plan that addresses monitoring and compliance requirements for PM, HCl, and D/F emissions.
  - (1) Submit the site specific monitoring plan to IDEM, OAQ for review at least six (6) months prior to the compliance date.
  - (2) IDEM, OAQ will review and approve or disapprove a proposed plan, based on whether the plan contains sufficient provisions to ensure continuing compliance with applicable emission limits and demonstrates, based on documented test results, the relationship between emissions of PM, HCl, and D/F and the proposed monitoring parameters for each pollutant. Test data must establish the highest level of PM, HCl, and D/F that will be emitted from the furnace. Subject to IDEM, OAQ approval of the OM&M plan, this may be determined by conducting performance tests and monitoring operating parameters while charging the furnaces with feed/charge materials containing the highest level of anticipated levels of oils and coatings and fluxing at the highest anticipated rate.
  - (3) Each site-specific monitoring plan must:
    - (A) Document each work practice, equipment/design practice, pollution prevention practice, or other measures used to meet the applicable emission standards.
    - (B) Include provisions for unit labeling as required in paragraph (b) of this condition, feed/charge weight measurement (or production weight measurement) as required in paragraph (d) of this condition and flux weight measurement as required in paragraph (e) of this condition.

- (C) Include these requirements:
  - (i) The owner or operator must record the type of feed/charge (e.g., ingot, thermally dried chips, dried scrap, etc.) For each operating cycle or time period used in the performance test; and
  - (ii) The owner or operator must submit a certification of compliance with the applicable operational standard for clean charge materials in 40 CFR 63.1506(n)(3) for each six (6) month reporting period. Each certification must contain the information in 40 CFR 63.1516(b)(2)(iv).
  - (iii) A scrap inspection program or a calculation method for monitoring the scrap contaminant level of furnace feed/charge materials. The owner or operator of a group 1 furnace dedicated to processing a distinct type of furnace feed/charge composed of scrap with a uniform composition (such as rejected product from a manufacturing process for which the coating-toscrap ratio can be documented) may include a program in the site specific monitoring plan for determining, monitoring, and certifying the scrap contaminant level using a calculation method rather than a scrap inspection program.
- (4) Pursuant to 40 CFR 63.1510(p), if a scrap inspection program is used, the program must include the following:
  - (A) A proven method for collecting representative samples and measuring the oil and coatings content of scrap samples;
  - (B) A scrap inspector training program;
  - (C) An established correlation between visual inspection and physical measurement of oil and coatings content of scrap samples;
  - (D) Periodic physical measurements of oil and coatings content of randomly-selected scrap samples and comparison with visual inspection results;
  - (E) A system for assuring that only acceptable scrap is charged to an affected furnace; and
  - (F) Recordkeeping requirements to document conformance with plan requirements.
- (5) Pursuant to 40 CFR 63.1510(p), if a scrap contaminant monitoring program using a calculation method is used, the program must include the following:
  - (A) Procedures for the characterization and documentation of the contaminant level of the scrap prior to the performance test.

- (B) Limitations on the furnace feed/charge to scrap of the same composition as that used in the performance test. If the performance test was conducted with a mixture of scrap and clean charge, limitations on the proportion of scrap in the furnace feed/charge to no greater than the proportion used during the performance test.
- (C) Operating, monitoring, recordkeeping, and reporting requirements to ensure that no scrap with a contaminant level higher than that used in the performance test is charged to the furnace.
- (h) Pursuant to 40 CFR 63.1510(t) and (u), the owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each SAPU on a daily basis using the procedures and equation listed in 40 CFR 63.1510(t) (1)-(5). As an alternative, the owner or operator may demonstrate, through performance tests, that each individual emission unit within the SAPU is in compliance with the applicable emission limits for the emission unit.

# Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

# D.3.14 Record Keeping Requirements [40 CFR 63.10] [40 CFR 63.1517]

- (a) To document compliance with Condition D.3.9, the Permittee shall maintain records of visible emission notations of the sidewell furnaces/multicyclone stack exhaust once per shift.
- (b) To document compliance with Condition D.3.10, the Permittee shall maintain the following:
  - Once per shift records of the following operational parameters during normal operation when venting to the atmosphere:
    - (A) Inlet and outlet differential static pressure; and
    - (B) Cleaning cycle operation.
- (c) To document compliance with Condition D.3.11, the Permittee shall maintain records of the results of the inspections required under Condition D.3.11 and the dates the vents are redirected.
- (d) Pursuant to 40 CFR 63.1517 and to document compliance with Condition D.3.3 and D.3.13, as required by 40 CFR 63.10(b), the owner or operator shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.
  - (1) The owner or operator must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.
  - (2) The owner or operator may retain records on microfilm, computer disks, magnetic tape, or microfiche; and

- (3) The owner or operator may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
- (e) In addition to the general records required by 40 CFR 63.10(b), the owner or operator of Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 must maintain records of:
  - (1) 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective actions taken.
  - (2) feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.
  - (3) All charge materials
  - (4) Operating logs documenting conformance with operating standards for maintinaing the level of molten metal above the top of the passage between the sidewell and hearth during reactive flux injection and for adding reactive flux only to the sidewell or a furnace hearth equipped with a control device for PM, HCI, and D/F emissions.
  - (5) Annual inspections of emission capture/collection and closed vent systems
  - (6) Any approved alternative monitoring or test procedure.
  - (7) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
    - (A) Startup, shutdown, and malfunction plan;
    - (B) OM&M plan;
    - (C) Site-specific secondary aluminum processing unit emission plan.
  - (8) Total charge weight, or if the owner or operator chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.
- (f) In addition to the general records required by 40 CFR 63.10(b), the owner or operator of Melt Furnace #4 and Melt Furnace #5 must maintain records of approved site-specific monitoring plan with records documenting conformance with the plan.
- (g) Pursuant to 40 CFR 63.1516(a), the owner or operator must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The owner or operator shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the

information required in 40 CFR 63.6(e)(3), the plan must include:

- (1) Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
- (2) Corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
- (h) The source must contain information specified in 40 CFR 63.10(c) in order to demonstrate conformance with the sources startup, shutdown and malfunction plan.
- (i) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

# D.3.15 Reporting Requirements [40 CFR 63.1515] [40 CFR 63.1516]

- (a) Pursuant to 40 CFR 63.1515(a) and as required by 40 CFR 63.9(b)(5), the owner or operator must submit initial notifications to IDEM, OAQ. If the owner or operator intends to construct a new affected source or reconstruct a source such that it becomes subject to this subpart, notification must be provided of the intended construction or reconstruction. The notification must include all the information required for an application for approval of construction or reconstruction as required by 40 CFR 63.5(d). For major sources, the application for approval of construction or reconstruction may be used to fulfill these requirements.
  - (1) The application must be submitted as soon as practicable before the construction or reconstruction is planned to commence (but no sooner than the effective date) if the construction or reconstruction commences after the effective date of this subpart; or
  - (2) The application must be submitted as soon as practicable before startup but no later than 90 days after the effective date of this subpart if the construction or reconstruction had commenced and initial startup had not occurred before the effective date.
  - (3) As required by 40 CFR 63.9(e) and (f), the owner or operator must provide notification of the anticipated date for conducting the performance tests and visible emission observations. The owner or operator must notify the administrator of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.
- (b) Pursuant to 40 CFR 63.1515(b), each owner or operator must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in the paragraphs (b)(1) through (7) of this section. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. In a State with an approved operating permit program where delegation of authority under section 112(I) of the CAA has not been requested or approved, the owner or operator must provide duplicate notification to the applicable Regional Administrator. If an owner or operator submits the information specified in this section at different times or in different

submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:

- (1) All information required in 40 CFR 63.9(h). The owner or operator must provide a complete performance test report for Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
- (2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system (including a continuous emission or opacity monitoring system).
- (3) Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
- (4) The compliant operating parameter value or range established with supporting documentation and a description of the procedure used to establish the value (e.g., lime injection rate, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.
- (5) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in 40 CFR 63.1506(c).
- (6) Approved OM&M plan
- (7) Startup, shutdown, and malfunction plan, with revisions.
- (c) Pursuant to 40 CFR 63.1516(a), the owner or operator must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The owner or operator shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:
  - (1) Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
  - (2) Corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
- (d) Pursuant to 40 CFR 63.1516(b) and as required by 40 CFR 63.10(e), the owner or operator must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the reporting period.

- (1) A report must be submitted if any of these conditions occur during a 6-month reporting period:
  - (A) An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
  - (B) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
  - (C) If Sidewell Furnace #4, Sidewell Furnace #5, Melt Furnace #4 and Melt Furnace #5 were not operated according to the requirements of this subpart.
- (2) Each report must include each of these certifications, as applicable:
  - (A) For Sidewell Furnace #4 and Sidewell Furnace #5: "Each furnace was operated such that the level of molten metal remained above the top of the passage between the sidewell and hearth during reactive fluxing, and reactive flux, except for cover flux, was added only to the sidewell or to a furnace hearth equipped with an add-on air pollution control device for PM, HCl, and D/F emissions during this reporting period."
  - (B) For Melt Furnace #4 and Melt Furnace #5: "Each group 1 furnace without add-on air pollution control devices subject to emission limits in 40 CFR 63.1505 (i)(2) processed only clean charge during this reporting period."
- (3) The owner or operator must submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.
- (e) Pursuant to 40 CFR 63.1516(c) and as required by 40 CFR part 70 or 71, for the purpose of annual certifications of compliance, the owner or operator must certify continuing compliance based upon, but not limited to, the following conditions:
  - (1) Any period of excess emissions, as defined in paragraph (e)(1) of this section, that occurred during the year were reported as required by this subpart; and
  - (2) All monitoring, recordkeeping, and reporting requirements were met during the year.

#### **SECTION D.4**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) 9.2 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #3, with a maximum throughput capacity of 3000 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-04. (Constructed in 1987)
- (b) One (1) 11 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #2, with a maximum throughput capacity of 3500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-05. (Constructed in 1990)
- (c) One (1) 11 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #1, with a maximum throughput capacity of 3500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-06. (Constructed in 1990)
- (d) One (1) carousel holding furnace, identified as Carousel Holding Furnace #1, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 1000 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-09. (Constructed in 1989)
- (e) One (1) carousel holding furnace, identified as Carousel Holding Furnace #2, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 1500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-08. (Constructed in 1987)
- (f) One (1) carousel holding furnace, identified as Carousel Holding Furnace #3, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 1500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-03. (Constructed in 1987)
- (g) One (1) carousel holding furnace, identified as Carousel Holding Furnace #4, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 1500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-10. (Constructed in 1988)
- (h) One (1) carousel holding furnace, identified as Carousel Holding Furnace #5, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 2500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-32. (Constructed in 1991)
- (i) One (1) carousel holding furnace, identified as Carousel Holding Furnace #6, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 2500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-50. (Constructed in 1994)

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

# D.4.1 Particulate Matter (PM) [326 IAC 6-3-2]

(a) Pursuant to 326 IAC 6-3-2, the allowable PM emissions for the following emission units is as listed in the table below. The pound per hour limitation was calculated with the following equation. Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour:

E = 4.10 P 0.67 where E = rate of emission in pounds per hour and P = process weight rate in tons per hour or the following

Facility	Process Weight Rate (pounds/hour)	Allowable PM (pounds/hour)
Carousel Holding Furnace #1	1000	2.58
Carousel Holding Furnace #2	1500	3.38
Carousel Holding Furnace #3	1500	3.38
Carousel Holding Furnace #4	1500	3.38
Carousel Holding Furnace #5	2500	4.76
Carousel Holding Furnace #6	2500	4.76
Melt Furnace #1	3500	5.96
Melt Furnace #2	3500	5.96
Melt Furnace #3	3000	5.38

# D.4.2 General Provisions Relating to NESHAP [326 IAC 20-1][40 CFR Part 63, Subpart A] The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 20-1, apply to the natural gas fired thermal chip dryer except when

reference in 326 IAC 20-1, apply to the natural gas fired thermal chip dryer except when otherwise specified in 40 CFR Part 63, Subpart RRR.

# D.4.3 Emission Standards and Operating Requirements [40 CFR 63.1505, 40 CFR 63.1506, Subpart RRR]

- (a) Pursuant to 40 CFR 63.1505(i),
  - (1) The owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 must use the following limits to determine the emission standards for a secondary aluminum processing unit (SAPU):
    - (A) 0.40 kg of PM per Mg (0.80 lb of PM per ton) of feed/charge
    - (B) 15 Fg of D/F TEQ per Mg (2.1 x 10-4 gr of D/F TEQ per ton) of feed/charge. This limit does not apply if the furnace processes only clean charge; and

- (C) 0.20 kg of HCl per Mg (0.40 lb of HCl per ton) of feed/charge
- (D) The owner or operator may determine the emission standards for Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 by applying the limits on the basis of the aluminum production weight in each furnace, rather than on the basis of feed/charge.
- (b) On and after the date of approval of the operation, maintenance and monitoring (OM&M) plan, the owner or operator must comply with the emission limits calculated using the equations for PM, HCl, and D/F listed in 40 CFR 63.1505(k) for Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6.
- (c) Pursuant to 40 CFR 63.1506(a), on and after the date the initial performance test is conducted or required to be conducted, whichever date is earlier, the owner or operator must operate Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 according to the requirements in this section. The completion of the initial performance tests for Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 shall be considered to be the date of approval of the OM&M plan by the permitting authority.
- (d) The owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 must:
  - (1) Pursuant to 40 CFR 63.1506(b), provide and maintain easily visible labels posted at each furnace that identifies the applicable emission limits and means of compliance, including:
    - (A) The type of affected source or emission unit (e.g. group 1 furnace, group 2 furnace, sidewell furnace)
    - (B) The applicable operational standard(s) and control method(s) (work practice or control device). This includes, but is not limited to, the type of charge to be used for a furnace (e.g., clean scrap only, all scrap, etc.), flux materials and additional practices, and the applicable operating parameter ranges and requirements as incorporated in the OM&M plan.
  - (2) Pursuant to 40 CFR 63.1506(d), except as provided in Condition D.4.3 (d)(2) (C), the owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 must:
    - (A) Install and operate a device that measures and records or otherwise determine the weight of feed/charge (or throughput) for each operating cycle or time period used in the performance test; and
    - (B) Operate each weight measurement system or other weight determination procedure in accordance with the OM&M plan.
    - (C) The owner or operator may choose to measure and record aluminum production weight from an affected source or emission unit rather than feed/charge weight to an affected source or emission unit, provided that:
      - (i) The aluminum production weight, rather than feed/charge weight is measured and recorded for all emission units; and

- (ii) All calculations to demonstrate compliance with the emission limits are based on aluminum production weight rather than feed/charge/weight.
- (3) Pursuant to 40 CFR 63.1506(p), when a process parameter or add-on air pollution control device operating parameter deviates from the value or range established during the performance test and incorporated in the OM&M plan, the owner or operator must initiate corrective action. Corrective action must restore operation of the affected source or emission unit (including the process or control device) to its normal or usual mode of operation as expeditiously as practicable in accordance with good air pollution practices for minimizing emissions. Corrective actions taken must include follow-up actions necessary to return the process or control device parameter level(s) to the value or range of values established during the performance test and steps to prevent the likely recurrence of the cause of a deviation.
- (e) Pursuant to 40 CFR 63.1506(n), the owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 must:
  - (1) Maintain the total reactive chlorine flux injection rate for each operating cycle or time period used in the performance test at or below the average rate established during the performance test.
  - (2) Operate each furnace in accordance with the work practice/pollution prevention measures documented in the OM&M plan and within the parameter values or ranges established in the OM&M plan.
  - (3) Operate each furnace using only clean charge as the feedstock.

### **Compliance Determination Requirements**

- D.4.4 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11] [40 CFR 63.1511 and 40 CFR 63.1512]
  - (a) Within 180 days after the issuance of this permit, in order to demonstrate compliance with Condition D.4.1, the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensible PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.
  - (b) The owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 is subject to the performance test/compliance demonstration general requirements and procedures as listed in 40 CFR 63.1511.
  - (c) Pursuant to 40 CFR 63.1512 (e) and the site specific monitoring plan required by 40 CFR 63.1510 (o), the owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 must include data and information demonstrating compliance with the applicable emission limits below:
    - (1) If Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 processes material other than clean charge, the owner or operator must conduct emission tests to measure emissions of PM, HCI, and D/F at the furnace exhaust outlet.

- (2) If Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 processes only clean charge, the owner or operator must conduct emission tests to simultaneously measure emissions of PM and HCl at the furnace exhaust outlet. A D/F test is not required. Each test must be conducted while the melt furnaces process only clean charge.
- (3) The owner or operator may choose to determine the rate of reactive flux added to the melt furnaces and assume, for the purposes of demonstrating compliance with the emission limits, that all reactive flux added to the melt furnaces is emitted. Under these circumstances, the owner or operator is not required to conduct an emission test for HCI.
- (d) Pursuant to 40 CFR 63.1512(j), the owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 must conduct performance tests as described in this section. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and Fg TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for each group 1 furnace processing only clean charge to measure emissions of PM and/or each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:
  - (1) Emissions of HCI (for the emission limit) or
  - (2) The mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard)
- (e) Pursuant to 40 CFR 63.1512(k), the owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6, subject to an emission limit in a kg/Mg (lb/ton) of feed/charge format must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the thermal chip dryer instead of the feed/charge weight.
- (f) Pursuant to 40 CFR 63.1512(o), the owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
  - (1) Continuously measure and record the weight of gaseous or liquid reactive flux injected for each 15 minute period during hte HCl and D/F tests, determine and record the 15-minute block average weights, and calculate and record the total weight of the gaseous or liquid reactive flux for the 3 test runs;
  - (2) Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs;
  - (3) Determine the total reactive chlorine flux injection rate by adding the recorded measurement of the total weight of chlorine in the gaseous or liquid reactive flux injected and the total weight of chlorine in the solid reactive flux using the following equation:

# $W_{t} = F_{1}W_{1} + F_{2}W_{2}$

Where.

W<sub>t</sub> = total chlorine usage, by weight

 $F_1$  = fraction of gaseous or liquid flux that is chlorine

W<sub>1</sub> = weight of reactive flux gas injected;

F<sub>2</sub> = fraction of solid reactive chloride flux that is chlorine

(e.g., F = 0.75 for magnesium chloride); and

 $W_2$  = weight of solid reactive flux;

- (4) Divide the weight of total chlorine usage (W<sub>t</sub>) for the 3 test runs; and
- (5) If a solid reactive flux other than magnesium chloride is used, the owner or operator must derive the appropriate proportion factor subject to approval by IDEM, OAQ.

#### D.4.5 Equations for Determining Compliance [40 CFR 63.1513]

- (a) The owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 must use the equations listed in 40 CFR 63.1513 in order to determine compliance with the applicable emission limits in Condition D.3.3.
- (b) The owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 must use the equation listed in 40 CFR 63.1510(t) in order to calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each SAPU on a daily basis as required in Condition D.3.3(b) pursuant to 40 CFR 63.1505(k).

#### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

# D.4.6 Compliance Monitoring Requirements [40 CFR 63.1510, Subpart RRR]

- (a) Pursuant to 40 CFR 63.1510(b), the owner or operator must prepare and implement for Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6, a written operation, maintenance and monitoring (OM&M) plan. Any subsequent changes to the plan must be submitted to the applicable permitting authority for review and approval. Pending approval by the applicable permitting authority of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan. Each plan must contain the following information:
  - (1) Process and control device parameters to be monitored to determine compliance, along with established operating levels or ranges, as applicable, for each process and control device.
  - (2) A monitoring schedule for each affected source and emission unit.
  - (3) Procedures for the proper operation and maintenance of each process unit and add-on control device used to meet the applicable emission limits or standards in 40 CFR 63.1505.
  - (4) Procedures for the proper operation and maintenance of monitoring devices or systems used to determine compliance, including:
    - (A) Calibration and certification of accuracy of each monitoring device, at least once every six (6) months, according to the manufacturer's instructions; and

- (B) Procedures for the quality control and quality assurance of continuous emission or opacity monitoring systems as required by the general provisions in Subpart A of this part.
- (5) Procedures for monitoring process and control device parameters, including the procedure to be used for determining charge/feed (or throughput) weight if a measurement device is not used.
- (6) Corrective actions to be taken when process or operating parameters or add-on control device parameters deviate from the value or range established in paragraph (5)(A) of this section, including:
  - (A) Procedures to determine and record the cause of a deviation or excursion, and the time the deviation or excursion began and ended; and
  - (B) Procedures for recording the corrective action taken, the time corrective action was initiated, and the time/date corrective action was completed.
- (7) A maintenance schedule for each process and control device that is consistent with the manufacturer's instructions and recommendations for routine and long-term maintenance.
- (8) Pursuant to 40 CFR 63.1510(s), the owner or operator must include within the OM&M plan prepared in accordance with 40 CFR 63.1510(b), the following information:
  - (A) The identification of each emission unit in the secondary aluminum processing unit;
  - (B) The specific control technology or pollution prevention measure to be used for each emission unit in the secondary aluminum processing unit and the date of its installation or application;
  - (C) The emission limit calculated for each secondary aluminum processing unit and performance test results with supporting calculations demonstrating initial compliance witheach applicable emission limit'
  - (D) Information and data demonstrating compliance for each emission unit with all applicable design, equipment, work practice or operational standards of this subpart; and
  - (E) The monitoring requirements applicable to each emission unit in a secondary aluminum processing unit and the monitoring procedures for daily calculation of the 3-day, 24-hour rolling average using the procedure in 40 CFR 63.1510(t). As an alternative to the procedures of 40 CFR 63.1510(t), an owner or operator may demonstrate, through performance tests, that each individual emission unit within the secondary aluminum production unit is in compliance with the applicable emission limits for the emission unit.
- (9) Pursuant to 40 CFR 63.1510(s), the SAPU compliance procedures within the OM&M plan may not contain any of the following provisions:

- (A) Any averaging among emissions of differing pollutants;
- (B) The inclusion of any affected sources other than emission units in a secondary aluminum processing unit;
- (C) The inclusion of any emission unit while it is shutdown; or
- (D) The inclusion of any periods of startup, shutdown, or malfunction in emission calculations.
- (10) To revise SAPU compliance provisions within the OM&M plan prior to the end of the permit term, the owner or operator must submit a request to IDEM, OAQ containing the information required by paragraph (8) of this section and obtain approval from IDEM, OAQ prior to implementing any revisions.
- (b) Pursuant to 40 CFR 63.1510(c), the owner or operator must inspect the labels for Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6, at least once per calendar month to confirm that posted labels as required by the operational standard in Condition D.4.3(b)(2)(A) are intact and legible.
- (c) Pursuant to 40 CFR 63.1510(e), the owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6, must install, calibrate, operate and maintain a device to measure and record the total weight of feed/charge to, or the aluminum production from, the sidewell furnaces over the same operating cycle or time period used in the performance test. Feed/charge or aluminum production within SAPUs must be measured and recorded on an emission unit-by-emission unit basis. As an alternative to a measurement device, the owner or operator may use a procedure acceptable to the applicable permitting authority to determine the total weight of feed/charge or aluminum production to the affected source or emission unit.
  - (1) the accuracy of the weight measurement device or procedure must be ±1 percent of the weight being measured. The owner or operator may apply to the permitting agency for approval to use a device of alternative accuracy if the required accuracy cannot be achieved as a result of equipment layout or charging practices. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standard.
  - the owner or operator must verify the calibration of the weight measurement device in accordance with the schedule specified in by the manufacturer, or if no calibration schedule is specified, at least once every six (6) months.
- (d) Pursuant to 40 CFR 63.1510(j), the owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6, must:
  - (1) Install, calibrate, operate, and maintain a device to continuously measure and record the weight of gaseous or liquid reactive flux injected to each affected source or emission unit.
    - (A) The monitoring system must record the weight for each 15-minute block period, during which reactive fluxing occurs, over the same operating cycle or time period used in the performance test.

- (B) The accuracy of the weight measurement device must be ±1 percent of the weight of the reactive component of the flux being measured. The owner or operator may apply to the permitting authority for permission to use a weight measurement device of alternative accuracy in cases where the reactive flux flow rates are so low as to make the use of a weight measurement device of ±1 percent impracticable. A device of alternative accuracy will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standards.
- (C) Verify the calibration of the weight measurement device in accordance with the schedule specified by the manufacturer, or if no calibration schedule is specified, at least once every 6 months.
- (2) Calculate and record the gaseous or liquid reactive flux injection rate (kg/Mg or lb/ton) for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
- (3) Record, for each 15-minute block period during each operating cycle or time period used in the performance test during which reactive fluxing occurs, the time, weight, and type of flux for each addition of:
  - (A) Gaseous or liquid reactive flux other than chlorine; and
  - (B) Solid reactive flux.
- (4) Calculate and record the total reactive flux injection rate for each operating cycle or time period used in the performance test using the procedure in 40 CFR 63.1512(o).
- (5) The owner or operator may apply to IDEM, OAQ for approval of an alternative method for monitoring and recording the total reactive flux addition rate based on monitoring the weight or quantity of reactive flux per ton of feed/charge for each operating cycle or time period used in the performance test. An alternative monitoring method will not be approved unless the owner or operator provides assurance through data and information that the affected source will meet the relevant emission standards on a continuous basis.
- (e) Pursuant to 40 CFR 63.1510(o), the owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6, must develop, in consultation with IDEM, OAQ, a written site-specific monitoring plan. The site-specific monitoring plan must be part of the OM&M plan that addresses monitoring and compliance requirements for PM, HCl, and D/F emissions.
  - (1) Submit the site specific monitoring plan to IDEM, OAQ for review at least six (6) months prior to the compliance date.

(2) IDEM, OAQ will review and approve or disapprove a proposed plan, based on whether the plan contains sufficient provisions to ensure continuing compliance with applicable emission limits and demonstrates, based on documented test results, the relationship between emissions of PM, HCl, and D/F and the proposed monitoring parameters for each pollutant. Test data must establish the highest level of PM, HCl, and D/F that will be emitted from the furnace. Subject to IDEM, OAQ approval of the OM&M plan, this may be determined by conducting performance tests and monitoring operating parameters while charging the furnaces with feed/charge materials containing the highest level of

- (3) Each site-specific monitoring plan must:
  - (A) Document each work practice, equipment/design practice, pollution prevention practice, or other measures used to meet the applicable emission standards.

anticipated levels of oils and coatings and fluxing at the highest anticipated rate.

- (B) Include provisions for unit labeling as required in paragraph (b) of this condition, feed/charge weight measurement (or production weight measurement) as required in paragraph (d) of this condition and flux weight measurement as required in paragraph (e) of this condition.
- (C) Include these requirements:
  - (i) The owner or operator must record the type of feed/charge (e.g., ingot, thermally dried chips, dried scrap, etc.) For each operating cycle or time period used in the performance test; and
  - (ii) The owner or operator must submit a certification of compliance with the applicable operational standard for clean charge materials in 40 CFR 63.1506(n)(3) for each six (6) month reporting period. Each certification must contain the information in 40 CFR 63.1516(b)(2)(iv).
  - (iii) A scrap inspection program or a calculation method for monitoring the scrap contaminant level of furnace feed/charge materials. The owner or operator of a group 1 furnace dedicated to processing a distinct type of furnace feed/charge composed of scrap with a uniform composition (such as rejected product from a manufacturing process for which the coating-toscrap ratio can be documented) may include a program in the site specific monitoring plan for determining, monitoring, and certifying the scrap contaminant level using a calculation method rather than a scrap inspection program.
- (4) Pursuant to 40 CFR 63.1510(p), if a scrap inspection program is used, the program must include the following:
  - (A) A proven method for collecting representative samples and measuring the oil and coatings content of scrap samples;
  - (B) A scrap inspector training program;

- (C) An established correlation between visual inspection and physical measurement of oil and coatings content of scrap samples;
- (D) Periodic physical measurements of oil and coatings content of randomly-selected scrap samples and comparison with visual inspection results:
- (E) A system for assuring that only acceptable scrap is charged to an affected furnace; and
- (F) Recordkeeping requirements to document conformance with plan requirements.
- (5) Pursuant to 40 CFR 63.1510(p), if a scrap contaminant monitoring program using a calculation method is used, the program must include the following:
  - (A) Procedures for the characterization and documentation of the contaminant level of the scrap prior to the performance test.
  - (B) Limitations on the furnace feed/charge to scrap of the same composition as that used in the performance test. If the performance test was conducted with a mixture of scrap and clean charge, limitations on the proportion of scrap in the furnace feed/charge to no greater than the proportion used during the performance test.
  - (C) Operating, monitoring, recordkeeping, and reporting requirements to ensure that no scrap with a contaminant level higher than that used in the performance test is charged to the furnace.
- (f) Pursuant to 40 CFR 63.1510(t) and (u), the owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 must calculate and record the 3-day, 24-hour rolling average emissions of PM, HCl, and D/F for each SAPU on a daily basis using the procedures and equation listed in 40 CFR 63.1510(t) (1)-(5). As an alternative, the owner or operator may demonstrate, through performance tests, that each individual emission unit within the SAPU is in compliance with the applicable emission limits for the emission unit.

#### Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

#### D.4.7 Record Keeping Requirements [40 CFR 63.10] [40 CFR 63.1517]

- (a) Pursuant to 40 CFR 63.1517 and to document compliance with Condition D.4.6, as required by 40 CFR 63.10(b), the owner or operator shall maintain files of all information (including all reports and notifications) required by the general provisions and this subpart.
  - (1) The owner or operator must retain each record for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The most recent 2 years of records must be retained at the facility. The remaining 3 years of records may be retained off site.
  - (2) The owner or operator may retain records on microfilm, computer disks, magnetic tape, or microfiche; and

- (3) The owner or operator may report required information on paper or on a labeled computer disk using commonly available and EPA-compatible computer software.
- (b) In addition to the general records required by 40 CFR 63.10(b), the owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 must maintain records of:
  - (1) 15-minute block average weights of gaseous or liquid reactive flux injection, total reactive flux injection rate and calculations (including records of the identity, composition, and weight of each addition of gaseous, liquid or solid reactive flux), including records of any period the rate exceeds the compliant operating parameter value and corrective actions taken.
  - (2) Feed/charge (or throughput) weights for each operating cycle or time period used in the performance test.
  - (3) All charge materials
  - (4) Any approved alternative monitoring or test procedure.
  - (5) Current copy of all required plans, including any revisions, with records documenting conformance with the applicable plan, including:
    - (A) Startup, shutdown, and malfunction plan;
    - (B) OM&M plan;
    - (C) Site-specific secondary aluminum processing unit emission plan.
  - (6) Total charge weight, or if the owner or operator chooses to comply on the basis of aluminum production, total aluminum produced for each 24-hour period and calculations of 3-day, 24-hour rolling average emissions.
- (c) In addition to the general records required by 40 CFR 63.10(b), the owner or operator of Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 must maintain records of approved site-specific monitoring plan with records documenting conformance with the plan.
- (d) All records shall be maintained in accordance with Section C General Record Keeping Requirements, of this permit.

#### D.4.8 Reporting Requirements [40 CFR 63.1515] [40 CFR 63.1516]

(a) Pursuant to 40 CFR 63.1515(a) and as required by 40 CFR 63.9(b)(5), the owner or operator must submit initial notifications to IDEM, OAQ. If the owner or operator intends to construct a new affected source or reconstruct a source such that it becomes subject to this subpart, notification must be provided of the intended construction or reconstruction. The notification must include all the information required for an application for approval of construction or reconstruction as required by 40 CFR 63.5(d). For major sources, the application for approval of construction or reconstruction may be used to fulfill these requirements.

- (1) The application must be submitted as soon as practicable before the construction or reconstruction is planned to commence (but no sooner than the effective date) if the construction or reconstruction commences after the effective date of this subpart; or
- (2) The application must be submitted as soon as practicable before startup but no later than 90 days after the effective date of this subpart if the construction or reconstruction had commenced and initial startup had not occurred before the effective date.
- (3) As required by 40 CFR 63.9(e) and (f), the owner or operator must provide notification of the anticipated date for conducting the performance tests and visible emission observations. The owner or operator must notify the administrator of the intent to conduct a performance test at least 60 days before the performance test is scheduled; notification of opacity or visible emission observations for a performance test must be provided at least 30 days before the observations are scheduled to take place.
- (b) Pursuant to 40 CFR 63.1515(b), each owner or operator must submit a notification of compliance status report within 60 days after the compliance dates specified in 40 CFR 63.1501. The notification must be signed by the responsible official who must certify its accuracy. A complete notification of compliance status report must include the information specified in the paragraphs (b)(1) through (7) of this section. The required information may be submitted in an operating permit application, in an amendment to an operating permit application, in a separate submittal, or in any combination. In a State with an approved operating permit program where delegation of authority under section 112(l) of the CAA has not been requested or approved, the owner or operator must provide duplicate notification to the applicable Regional Administrator. If an owner or operator submits the information specified in this section at different times or in different submittals, later submittals may refer to earlier submittals instead of duplicating and resubmitting the information previously submitted. A complete notification of compliance status report must include:
  - (1) All information required in 40 CFR 63.9(h). The owner or operator must provide a complete performance test report for Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6. A complete performance test report includes all data, associated measurements, and calculations (including visible emission and opacity tests).
  - (2) The approved site-specific test plan and performance evaluation test results for each continuous monitoring system (including a continuous emission or opacity monitoring system).
  - (3) Unit labeling as described in 40 CFR 63.1506(b), including process type or furnace classification and operating requirements.
  - (4) The compliant operating parameter value or range established with supporting documentation and a description of the procedure used to establish the value (e.g., lime injection rate, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature), including the operating cycle or time period used in the performance test.

- (5) Design information and analysis, with supporting documentation, demonstrating conformance with the requirements for capture/collection systems in 40 CFR 63.1506(c).
- (6) Approved OM&M plan
- (7) Startup, shutdown, and malfunction plan, with revisions.
- (c) Pursuant to 40 CFR 63.1516(a), the owner or operator must develop and implement a written plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with the standard. The owner or operator shall also keep records of each event as required by 40 CFR 63.10(b) and record and report if an action taken during a startup, shutdown, or malfunction is not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3). In addition to the information required in 40 CFR 63.6(e)(3), the plan must include:
  - (1) Procedures to determine and record the cause of the malfunction and the time the malfunction began and ended; and
  - (2) Corrective actions to be taken in the event of a malfunction of a process or control device, including procedures for recording the actions taken to correct the malfunction or minimize emissions.
- (d) Pursuant to 40 CFR 63.1516(b) and as required by 40 CFR 63.10(e), the owner or operator must submit semiannual reports within 60 days after the end of each 6-month period. Each report must contain the information specified in 40 CFR 63.10(c). When no deviations of parameters have occurred, the owner or operator must submit a report stating that no excess emissions occurred during the reporting period.
  - (1) A report must be submitted if any of these conditions occur during a 6-month reporting period:
    - (A) An excursion of a compliant process or operating parameter value or range (e.g., lime injection rate or screw feeder setting, total reactive chlorine flux injection rate, afterburner operating temperature, fabric filter inlet temperature, definition of acceptable scrap, or other approved operating parameter).
    - (B) An action taken during a startup, shutdown, or malfunction was not consistent with the procedures in the plan as described in 40 CFR 63.6(e)(3).
    - (C) If Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 were not operated according to the requirements of this subpart.
  - (2) Each report must include this certification for Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6: "Each group 1 furnace without add-on air pollution control devices subject to emission limits in 40 CFR 63.1505 (i)(2) processed only clean charge during this reporting period."

- (3) The owner or operator must submit the results of any performance test conducted during the reporting period, including one complete report documenting test methods and procedures, process operation, and monitoring parameter ranges or values for each test method used for a particular type of emission point tested.
- (e) Pursuant to 40 CFR 63.1516(c) and as required by 40 CFR part 70 or 71, for the purpose of annual certifications of compliance, the owner or operator must certify continuing compliance based upon, but not limited to, the following conditions:
  - (1) Any period of excess emissions, as defined in paragraph (e)(1) of this section, that occurred during the year were reported as required by this subpart; and
  - (2) All monitoring, recordkeeping, and reporting requirements were met during the year.

#### SECTION D.5 FACILITY OPERATION CONDITIONS

#### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) Paint Hook Stripping oven, associated with the R-30 Powder Coat paint line, with a maximum heat input capacity of 0.35 million Btu per hour, exhausting to one (1) stack, identified as S-21.
- (b) One (1) paint line, identified as the R-40 Powder Clear Coat paint line, with:
  - \* One (1) Pretreat Line Stage #2 burner, with a maximum heat input capacity of 2.07 million Btu per hour, exhausting to one (1) stack, identified as S-34.
  - \* One (1) Pretreat Line Stage #3 burner, with a maximum heat input capacity of 1.38 million Btu per hour, exhausting to one (1) stack, identified as S-35.
  - \* One (1) Pretreat Line Stage #8 burner, with a maximum heat input capacity of 0.325 million Btu per hour, exhausting to one (1) stack, identified as S-36.
  - \* One (1) Dryoff Zone #1 oven, with a maximum heat input capacity of 0.838 million Btu per hour, exhausting to one (1) stack, identified as S-37.
  - \* One (1) Dryoff Zone #2 oven, with a maximum heat input capacity of 1.02 million Btu per hour, exhausting to one (1) stack, identified as S-38.
  - \* One (1) R-40 Cure oven, with a maximum heat input capacity of 2.78 million Btu per hour, exhausting to one (1) stack, identified as S-39.
- (c) One (1) shotblasting room/booth, with a maximum capacity of 5376 pounds per hour, with one (1) baghouse for particulate matter control, exhausting to one (1) stack, identified as S-33.

#### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.5.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission rate from the insignificant activities listed above shall not exceed allowable PM emission rate based on the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$  where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

#### D.5.2 Incinerator [326 IAC 4-2-2]

Pursuant to 326 IAC 4-2-2, the paint hook stripping oven shall:

- (1) Consist of primary and secondary chambers or the equivalent;
- (2) Be equipped with a primary burner unless burning wood products;
- (3) Comply with 326 IAC 5-1 and 326 IAC 2;
- (4) Be maintained properly as specified by the manufacturer and approved by the commissioner:
- (5) Be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;
- (6) Comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (7) Be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (8) Not emit particulate matter in excess of:
  - (A) Incinerators with a maximum refuse-burning capacity of two hundred (200) or more pounds per hour: three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; or

Hayes Lemmerz International - Indiana, Inc. Huntington, Indiana

Permit Reviewer: Felicity L. Lao / AMC

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- (B) All other incinerators: five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
- (9) Not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

#### Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

#### D.5.3 Particulate Matter (PM)

In order to comply with D.6.1, the baghouse for PM control shall be in operation and control emissions from the one (1) shotblasting room/booth at all times when the booths/lines are in operation.

Hayes Lemmerz International - Indiana, Inc. Huntington, Indiana

Permit Reviewer: Felicity L. Lao / AMC

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE BRANCH

# PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Hayes Lemmerz International - Indiana, Inc. Source Address: 1870 Riverfork Drive, Huntington, Indiana 46750 Mailing Address: 1870 Riverfork Drive, Huntington, Indiana 46750

Part 70 Permit No.: T069-7421-00031

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
Please check what document is being certified:
9 Annual Compliance Certification Letter
9 Test Result (specify)
9 Report (specify)
9 Notification (specify)
9 Affidavit (specify)
9 Other (specify)
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

## INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY

COMPLIANCE BRANCH 100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 Phone: 317-233-5674 Fax: 317-233-5967

### PART 70 OPERATING PERMIT EMERGENCY OCCURRENCE REPORT

Source Name: Hayes Lemmerz International - Indiana, Inc.
Source Address: 1870 Riverfork Drive, Huntington, Indiana 46750
Mailing Address: 1870 Riverfork Drive, Huntington, Indiana 46750

Part 70 Permit No.: 069-7421-00031

#### This form consists of 2 pages

Page 1 of 2

9	This is an emergency as defined in 326 IAC 2-7-10	12)
/	This is an emergency as defined in 320 IAC 2-7-10	

- The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:	
Control Favings and	
Control Equipment:	
Permit Condition or Operation Limitation in Permit:	
Description of the Emergency:	
Describe the cause of the Emergency:	

Page 2 of 2

If any of the following are not applicable, mark N/A

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>X</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:
Form Completed by:
Title / Position:
Date:
Phone:

A certification is not required for this report.

Phone:

Permit Reviewer: Felicity L. Lao / AMC

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

	COMPLIA	NCE DATA SECTION		
	Part 70	Quarterly Report		
Source Name: Source Address: Mailing Address: Part 70 Permit No.: Facility: Parameter: Limit:	Hayes Lemmerz International - Indiana, Inc. 1870 Riverfork Drive, Huntington, Indiana 46750 1870 Riverfork Drive, Huntington, Indiana 46750 069-7421-00031 Natural gas fired thermal chip dryer VOC input coolant on the chips is limited to twelve (12) tons of VOC per twelve (12) consecutive month period*			
	YEAI	₹:		
Month	VOC Usage/Emissions (tons/month)	VOC Usage/Emissions Previous 11 Months (tons)	VOC Usage/Emissions 12 Month Total (tons)	
Month 1				
Month 2				
Month 3				
	nips (maximum) * 1.5% aqueoution is 5 parts coolant to 95 pa			
9 9	No deviation occurred Deviation/s occurred Deviation has been	d in this quarter.		
Sub	mitted by:			
Title	e / Position:			
Sigr	nature:			
Date	e:			

Attach a signed certification to complete this report.

Source Name:

# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION

## PART 70 OPERATING PERMIT QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Haves Lemmerz International - Indiana. Inc.

Source Address: Mailing Address: Part 70 Permit No.:			gton, Indiana 46750 gton, Indiana 46750	
Months:		Year:	 Page 1 of 2	
report shall be submit the date(s) of each de be reported. Deviation reported according to included in this report	tted quarterly based of eviation, the probable ns that are required to the schedule stated to Additional pages not the schedule stated to Additional pages not the schedule stated to the schedule schedule stated to the schedule schedul	on a calent e cause of to be repor in the app nay be atta	all the requirements stated in this permit. This indar year. Any deviation from the requirements, if the deviation, and the response steps taken must red by an applicable requirement shall be olicable requirement and do not need to be ached if necessary. If no deviations occurred, curred this reporting period".	
9 NO DEVIATIONS	OCCURRED THIS R	EPORTIN	IG PERIOD.	
9 THE FOLLOWING	DEVIATIONS OCCI	JRRED TH	HIS REPORTING PERIOD	
Permit Requirement	(specify permit cond	dition #)		
Date of Deviation:			Duration of Deviation:	
Number of Deviation	ıs:			
Probable Cause of D	Deviation:			
Response Steps Tal	ken:			
Permit Requirement	(specify permit cond	dition #)		
Date of Deviation:			Duration of Deviation:	
Number of Deviation	าร:			
Probable Cause of D	Deviation:			
Response Steps Tal	ken:			

Page 2 of 2

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Form Completed By:	
Title/Position:	
Date:	
Phone:	

# Indiana Department of Environmental Management Office of Air Quality

## Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: Hayes Lemmerz International - Indiana, Inc. Source Location: 1870 Riverfork Drive, Huntington, IN 46750

County: Huntington
SIC Code: 3714, 3361
Operation Permit No.: T069-7421-00031

Permit Reviewer: Amy Cook

On August 23, 2001, the Office of Air Quality (OAQ) had a notice published in the Herald Press, Huntington, Indiana, stating that Hayes Lemmerz International - Indiana, Inc. had applied for a Part 70 Operating Permit to manufacture aluminum wheels for automobiles and light trucks. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On September 26, 2001, OAQ received the comments from the source. If revisions to the permit are required, bolded language shall indicate language that has been added, language with a line through it has been deleted.

#### Comment 1:

Hayes Lemmerz would like to add 6 low pressure casting machines. We currently have the 6 low pressure casting units permitted, 4 of which are installed. The 6 new units are the same as the ones currently installed and those were permitted as exempt units pursuant to Exemption 069-13803-00031, issued on April 25, 2001.

#### **Response to Comment 1:**

The six (6) new units have been determined to be exempt and will be considered insignificant activities because the PTE of all criteria pollutants are less than the thresholds listed under 326 IAC 2-1.1-3. However, IDEM, OAQ, has noted the previous six (6) electric low pressure casting units were incorrectly placed under natural gas-fired combustion sources. Since the units are electric they have been moved from A.3(a)(10) to A.3(x)(4) along with the new six (6) units. The units have also been removed from Section D.5 - Facility Description since no rules are applicable.

Condition A.3(a)(10) and A.3(x)(4) have been revised as follows:

- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

  This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):
  - (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
    - (10) Six (6) electric low pressure aluminum wheel casting units, each with a maximum design throughput of 60 wheels per hour. (constructed in 2001)
  - (x) Other activities or categories not previously identified:

(4) Six (6) Twelve (12) electric low pressure aluminum wheel casting units, each with a maximum design throughput of 60 wheels per hour. (Six (6) constructed in 2001) (Six (6) constructed in 2002)

Condition D.5(j) - (m) has been revised as follows:

**SECTION D.5** 

#### **FACILITY OPERATION CONDITIONS**

# Facility Description [326 IAC 2-7-5(15)]: (j) Six (6) electric low pressure aluminum wheel casting units, each with a maximum design throughput of 60 wheels per hour. (constructed in 2001) (k) (j) One (1) shotblasting room/booth, with a maximum capacity of 5376 pounds per hour, with one (1) baghouse for particulate matter control, exhausting to one (1) stack, identified as S-33.

One (1) chip wringer that feeds into the natural gas fired thermal chip dryer at a rate of 3600 pounds

#### Comment 2:

<del>(l)</del> (k)

Hayes Lemmerz will be adding one age oven which is used to heat wheels to 300 degrees for aging purposes. The wheels are clean castings, which means, no paint or oils are present. Based on the emissions calculations this unit would be exempt.

#### **Response to Comment 2:**

The age oven has been added to the Part 70 permit as an insignificant activity and is considered exempt pursuant to 326 IAC 2-1.1-3(d)(5).

Condition A.3(a) has been revised as follows:

of aluminum per hour.

- A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

  This stationary source also includes the following insignificant activities as defined in 326 IAC 2-7-1(21):
  - (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
    - (10) One (1) natural gas-fired age oven, with a maximum heat input capacity of one (1) MMBtu/hr, used to heat clean wheels to 300 degrees for aging purposes. The age oven is operated in a batch cycle of 4000 pounds of wheels per batch.

#### Comment 3:

Condition D.2.18(e)(2) states that each report must include this certification: "Only unpainted aluminum chips were used as feedstock in any thermal chip dryer during this reporting period." Hayes Lemmerz states that there is some paint present on some of the chips. The paint is dry and does not represent a significant volume of our chips. The painted chips come from the machining operation. Hayes Lemmerz is requesting to allow for paint on the chips.

#### **Response to Comment 3:**

Condition D.2.18(e)(2) is required pursuant to the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR 63.1516(b)(2)(i). No deviation from this NESHAP can be allowed unless approved by the Environmental Protection Agency (EPA).

#### Comment 4:

Condition D.3.10 states that the static pressure drop on the baghouse is to be checked once per shift. Hayes Lemmerz would like to be allowed to check the static pressure drop on the baghouse daily rather than once per shift.

#### **Response to Comment 4:**

The pressure drop monitoring is used to indicate compliance with 326 IAC 6. This requirement is designed as a trigger that the source perform some corrective action on the facility if the pressure drop is abnormal, to ensure continuous compliance with emission limitations. IDEM, OAQ, does not believe that a daily monitoring frequency is adequate to indicate compliance with 326 IAC 6. This condition has not been changed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified to reflect these changes.

\*NOTE: The Table of Contents of the Title V has been revised to better clarify the conditions of the permit.

**1:** IDEM, OAQ has determined that some of the insignificant activities listed in Condition A.3 were incorrectly placed in Section D.5. The insignificant activities that do not have applicable rules have been removed from Condition D.5

Condition D.5 has been revised as follows:

#### **SECTION D.5**

#### **FACILITY OPERATION CONDITIONS**

#### Facility Description [326 IAC 2-7-5(15)]:

- (a) One (1) Dry-Off oven for the R-30 powder and liquid coating lines, with a maximum heat input capacity of 1.43 million Btu per hour, exhausting to one (1) stack, identified as S-11.
- (b) One (1) 3-stage Curing oven used for the R-30 Color Coat liquid booth and the R-30 Powder Coat paint line, consisting of: one (1) 2-stage Powder Paint cure oven with a maximum heat input capacity of 2.87 million Btu per hour and one (1) Electric Infrared powder coating oven, with a maximum throughput capacity of 800 wheels per hour, exhausting to three (3) stacks, identified as S-12, S-13 and S-14.
- (e) (a) One (1) Paint Hook Stripping oven, associated with the R-30 Powder Coat paint line, with a maximum heat input capacity of 0.35 million Btu per hour, exhausting to one (1) stack, identified as S-21.
- One (1) Heat Treat furnace, identified as HTF-A, with a maximum heat input capacity of 8 million Btu per hour, exhausting to six (6) stacks, identified as S15, S-16, S-17, S-18, S-19 and S-20.
- (e) One (1) Heat Treat furnace, identified as HTF-B, with a maximum heat input capacity of 6 million Btu per hour, exhausting to six (6) stacks, identified as S-26, S-45, S-46, S-47, S-48 and S-49.

- (f) (b) One (1) paint line, identified as the R-40 Powder Clear Coat paint line, with:
  - \* One (1) Pretreat Line Stage #2 burner, with a maximum heat input capacity of 2.07 million Btu per hour, exhausting to one (1) stack, identified as S-34.
  - \* One (1) Pretreat Line Stage #3 burner, with a maximum heat input capacity of 1.38 million Btu per hour, exhausting to one (1) stack, identified as S-35.
  - \* One (1) Pretreat Line Stage #8 burner, with a maximum heat input capacity of 0.325 million Btu per hour, exhausting to one (1) stack, identified as S-36.
  - \* One (1) Dryoff Zone #1 oven, with a maximum heat input capacity of 0.838 million Btu per hour, exhausting to one (1) stack, identified as S-37.
  - \* One (1) Dryoff Zone #2 oven, with a maximum heat input capacity of 1.02 million Btu per hour, exhausting to one (1) stack, identified as S-38.
  - \* One (1) R-40 Cure oven, with a maximum heat input capacity of 2.78 million Btu per hour, exhausting to one (1) stack, identified as S-39.
- (g) One (1) Rim Heating oven, with a maximum heat input capacity of 0.4 million Btu per hour, exhausting to one (1) stack, identified as S-56.
- (h) One (1) mold coating/repair process with two (2) mold bake ovens, identified as Mold Bake oven North and Mold Bake oven South, each with a maximum heat input capacity of 1.2 million Btu per hour, resulting in fugitive emissions and exhausting indoors at points S-63 and S-64.
- (i) One (1) natural gas-fired in-line heat treat furnace, identified as In-Line Heat Treat Furnace, with a maximum heat input capacity of 6.0 million Btu per hour, exhausting to one (1) stack designated as S-59. (Constructed in 2001)
- (j) (c) One (1) shotblasting room/booth, with a maximum capacity of 5376 pounds per hour, with one (1) baghouse for particulate matter control, exhausting to one (1) stack, identified as S-33.
- (k) One (1) chip wringer that feeds into the natural gas fired thermal chip dryer at a rate of 3600 pounds of aluminum per hour.
- 2: The IDEM, OAQ, has revised Condition B.15 Deviations from Permit Requirements and Conditions and certain Parametric Monitoring conditions in the D section of the permit to address concerns regarding the independent enforceability of permit conditions [see 40 CFR 70.6(a)(6)(i)]. The Parametric Monitoring conditions have been revised to establish normal operating conditions for the emission unit or control device and to require implementation of the compliance response plan when monitoring indicates operation is outside the normal range. Language that inferred that operating outside of the normal range could be considered by itself to be a deviation was removed. B.15 was revised to remove language that could be considered to grant exemptions from permit requirements and to clarify reporting obligations.

Condition B.15 and Condition D.2.5 have been revised as follows:

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management Compliance Data Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015 using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and do does not need to be included in this report.

The notification by the Permittee Quarterly Deviation and Compliance Monitoring Report does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
  - (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

#### D.2.13 Parametric Monitoring

The Permittee shall record the total static pressure drop across the multicyclone used in conjunction with the thermal chip dryer, at least once per shift when the thermal chip dryer is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, When for any one reading, the pressure drop across the baghouse shall be maintained within is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The ,the Permittee shall take reasonable response steps in accordance with Section C-Compliance Response Plan - Preparation, Implementation, Records, and Reports for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Monitoring Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

#### D.3.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the multicyclone used in conjunction with the sidewell furnaces, at least once per shift when Sidewell Furnace #4 and/or Sidewell Furnace #5 is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, When for any one reading, the pressure drop across the baghouse-shall be maintained within is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The ,the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan - Preparation, Implementation, Records, and Reports. for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C -

Compliance Monitoring Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

**3:** Part 70 requires any application form, report, or compliance certification to be certified by the Responsible Official. IDEM, OAQ, has revised C.8 Asbestos Abatement Projects to clarify that the asbestos notification does not require a certification by the responsible official, but it does need to be certified by the owner or operator. IDEM, OAQ has revised C.18 Actions Related to Noncompliance Demonstrated by a Stack Test; a certification by the responsible official is required for the notification sent in response to noncompliance with a stack test.

Condition C.8 and Condition C.18 have been revised as follows:

- C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]
  - (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
  - (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
    - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
    - (2) If there is a change in the following:
      - (A) Asbestos removal or demolition start date:
      - (B) Removal or demolition contractor; or
      - (C) Waste disposal site.
  - (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
  - (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management Asbestos Section, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the

information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control
  The Permittee shall comply with the applicable emission control procedures in 326 IAC
  14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are
  applicable for any removal or disturbance of RACM greater than three (3) linear feet on
  pipes or three (3) square feet on any other facility components or a total of at least 0.75
  cubic feet on all facility components.
- (f) Indiana Accredited Asbestos Inspector
  The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator,
  prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to
  thoroughly inspect the affected portion of the facility for the presence of asbestos. The
  requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61,
  Subpart M, is federally enforceable.

#### C.18 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

- (a) When the results of a stack test performed in conformance with Section C Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**4:** The IDEM, OAQ has restructured C.17 to clarify the contents and implementation of the compliance response plan. The name of the condition has been changed to better reflect the contents of the condition. The language regarding the OAQ's discretion to excuse failure to perform monitoring under certain conditions has been deleted. The OAQ retains the discretion to excuse minor incidents of missing date; however, it is not necessary to state criteria regarding the exercise of that discretion in the permit. In (c)(2) "administrative amendment" has been revised to "minor permit modification," because 326 IAC 2-7-11(a)(7) has been repealed. Requests that do not involve significant changes to monitoring, reporting, or recordkeeping requirements may now be approved as minor permit modifications.

Condition C.17 has been revised as follows:

C.17 Compliance Monitoring Response Plan - Failure to Take Response Steps Preparation, Implementation, Records, and Reports [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) The Permittee is required to **prepare** implement: a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with

applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:

- (1) This condition;
- (2) The Compliance Determination Requirements in Section D of this permit;
- (3) The Compliance Monitoring Requirements in Section D of this permit;
- (4) The Record Keeping and Reporting Requirements in Section C (General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
- (5) A a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, and maintained on site, and is comprised of:
  - (A) (1) Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
  - (B) A time schedule for taking reasonable response steps including a schedule for devising additional response steps for situations that may not have been predicted.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows: Failure to take reasonable response steps may constitute a violation of the permit.
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation

from this permit so long as the Permittee documents such response steps in accordance with this condition.

- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) Upon investigation of a compliance monitoring excursion, the **The** Permittee is excused from taking not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment **and**This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (d) (e) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (e)(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed at all times when the equipment emission unit is operating, except for time necessary to perform quality assurance and maintenance activities. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.
- (f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in

any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.

**5**: The Annual Compliance Certifications and the Part 70 Certification Report From both listed the Compliance Date Section as the branch to send the above mentioned forms. However, the correct branch which the forms should be submitted to is the Compliance Branch.

Condition B.10 and the Part 70 Certification Report Form have been revised as follows:

B.10 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management Compliance <del>Data Section</del> **Branch**, Office of Air Quality 100 North Senate Avenue, P.O. Box 6015 Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J) 77 West Jackson Boulevard Chicago, Illinois 60604-3590

- (a) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, of affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (b) The annual compliance certification report shall include the following:
  - (a) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (b) The compliance status;
  - (c) Whether compliance was continuous or intermittent;
  - (d) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (e) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Hayes Lemmerz International - Indiana, Inc. Huntington, Indiana Permit Reviewer: Amy Cook

#### INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT **OFFICE OF AIR QUALITY COMPLIANCE DATA SECTION BRANCH**

#### **PART 70 OPERATING PERMIT CERTIFICATION**

Source Name: Hayes Lemmerz International - Indiana, Inc. Source Address: 1870 Riverfork Drive, Huntington, IN 46750 Mailing Address: 1870 Riverfork Drive, Huntington, IN 46750 Part 70 Permit No.: T069-7421-00031

1 411 70 7 611111 110 1005-7-42 1-00051
This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.
Please check what document is being certified:
9 Annual Compliance Certification Letter
9 Emergency/Deviation Occurrence Reporting Form
9 Test Result (specify)
9 Report (specify)
9 Notification (specify)
9 Other (specify)
I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Date:

**6:** The following updates have been made to incorporate the Article 2 rule revisions that were adopted on October 3, 2001, and become effective on January 19, 2002. For more information about this rulemaking, refer to the October 2001 Air Pollution Control Board Packet which can be found on the internet at <a href="http://www.state.in.us/idem/air/rules/apcb/packets/index.html">http://www.state.in.us/idem/air/rules/apcb/packets/index.html</a>. The rule revisions will be published in February 1, 2002 Indiana Register which can be found on the internet at <a href="http://www.IN/gov/legislative/register/index-25.html">http://www.IN/gov/legislative/register/index-25.html</a>.

Conditions B.2, B.12(a)(b) and (g), B.14, and B.13 have been revised as follows:

Add the new rule cite to B.2 Permit Term.

#### B.2 Permit Term [326 IAC 2-7-5(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

- B.12 Emergency Provisions (a)(b) and (g) have been revised to reflect rule changes to 326 IAC 2-7-16. This section of the rule is now consistent with 40 CFR 70.6(g) and provides and affirmative defense to an action brought for non-compliance with technology-based emission limitations only.
- B.12 Emergency Provisions [326 IAC 2-7-16]
  - (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
  - (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
  - (g) Operations may continue during an emergency only if the following conditions are met:
- (1)—If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
- (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
  - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
  - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Multiple Exceedances has been deleted, because 326 IAC 2-7-5(1)(E) has been repealed, because it conflicted with 40 CFR 70.6(a)(6).

B.14 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.14 Prior Permits Superseded was added to the permit to implement the intent of the new rule 326 IAC 2-1.1-9.5.

#### B.14 Prior Permits Superseded [326 IAC 2-1.1-9.5]

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated
  - (2) revised, or
  - (3) deleted

by this permit

(b) All previous registrations and permits are superseded by this permit.

Remove (b) from B.13 Permit Shield. Since B.14 Prior Permits Superseded has been added the permit, it is not necessary for this statement to be in this condition.

B.13 Permit Shield [326 IAC 2-7-15] [326 IAC 2-7-20] [326 IAC 2-7-12]

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. All previously issued operating permits are superseded by this permit.

# Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Operating Permit

#### **Source Background and Description**

Source Name: Hayes Lemmerz International - Indiana, Inc.
Source Location: 1870 Riverfork Drive, Huntington, Indiana 46750

County: Huntington SIC Code: 3714, 3361

Operation Permit No.: T069-7421-00031

Permit Reviewer: Felicity L. Lao / Amy Cook

The Office of Air Quality (OAQ) has reviewed a Part 70 permit application from Hayes Lemmerz International - Indiana, Inc. relating to an operation that manufactures aluminum wheels for automobiles and light trucks.

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) paint booth, identified as R-30 Color Coat liquid booth, equipped with ten (10) air atomized spray guns, with a maximum capacity to paint 800 aluminum wheels per hour, using dry filters for particulate matter control, exhausting to one (1) stack, identified as S-22. (Constructed in 1993)
- (b) One (1) paint line, identified as the R-30 Powder Coat paint line, with two (2) booths, identified as Powder Coat paint booth North and Powder Coat paint booth South, equipped with a total of four (4) electrostatic air atomized spray guns, with a total maximum throughput capacity of 800 wheels per hour, using dry filters for particulate matter control, exhausting indoors with filtered recycling. (Constructed in 1989)
- (c) One (1) paint line, identified as the R-40 Powder Clear Coat paint line, equipped with one (1) electrostatic air atomized spray gun, with a total maximum throughput capacity of 420 wheels per hour, using dry filters for particulate matter control, exhausting indoors with filtered recycling. (Constructed in 1993)
- (d) One (1) 5.2 million Btu per hour natural gas fired thermal chip dryer, with a maximum throughput capacity of 3600 pounds of aluminum per hour, vented to an afterburner furnace (used as fire prevention and not as continuous emissions control), which has a maximum heat input capacity of 7 million Btu per hour, equipped with a chip hopper that is vented to a multicyclone for particulate matter control. The dryer will process in house process scrap/aluminum chips and operate at a temperature of 800 EF, exhausting to one (1) stack, identified as S-53. (Constructed in 1996)
- (e) One (1) 12 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #5, with an associated sidewell furnace, identified as Sidewell Furnace #5 with a combined total maximum throughput of 6000 pounds of aluminum per hour. Sidewell Furnace #5 is permitted to melt in-house process aluminum scrap. Melt Furnace #5 has a maximum throughput of 4500 pounds of clean aluminum/ingots per hour and exhausts to one (1) stack, identified as S-54, with emissions uncontrolled. Sidewell #5 has a maximum throughput of 1500 pounds of in-house process aluminum scrap per hour, is equipped with a multicyclone as control, and exhausts to one (1) stack, identified as S-53. (Constructed in 1996)

- (f) One (1) 12 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #4, with an associated sidewell furnace, identified as Sidewell Furnace #4 and a total maximum throughput of 6000 pounds of aluminum per hour. Sidewell Furnace #4 is permitted to melt in-house process aluminum scrap (and may only do so as a backup for periods when Melt Furnace #5 is not operational in the event of breakdown or failure). Melt Furnace #4 has a maximum throughput of 4500 pounds of clean aluminum per hour and exhausts to one (1) stack, identified as S-43, with emissions uncontrolled. Sidewell #4 has a maximum throughput of 1500 pounds of in-house aluminum scrap per hour, is equipped with a multicyclone as control, and exhausts to one (1) stack, identified as S-53. (Constructed in 1994)
- (g) One (1) 9.2 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #3, with a maximum throughput capacity of 3000 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-04. (Constructed in 1987)
- (h) One (1) 11 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #2, with a maximum throughput capacity of 3500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-05. (Constructed in 1990)
- (i) One (1) 11 million Btu per hour natural gas fired reverberatory furnace, identified as Melt Furnace #1, with a maximum throughput capacity of 3500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-06. (Constructed in 1990)
- (j) One (1) carousel holding furnace, identified as Carousel Holding Furnace #1, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 1000 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-09. (Constructed in 1989)
- (k) One (1) carousel holding furnace, identified as Carousel Holding Furnace #2, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 1500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-08. (Constructed in 1987)
- (I) One (1) carousel holding furnace, identified as Carousel Holding Furnace #3, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 1500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-03. (Constructed in 1987)
- (m) One (1) carousel holding furnace, identified as Carousel Holding Furnace #4, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 1500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-10. (Constructed in 1988)
- (n) One (1) carousel holding furnace, identified as Carousel Holding Furnace #5, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 2500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-32. (Constructed in 1991)

Permit Reviewer: FLL / AMC

(o) One (1) carousel holding furnace, identified as Carousel Holding Furnace #6, rated at 3.0 million Btu per hour, with a maximum throughput capacity of 2500 pounds of clean aluminum/ingots per hour, exhausting to one (1) stack, identified as S-50. (Constructed in 1994)

#### **Unpermitted Emission Units and Pollution Control Equipment**

The source also consists of the following unpermitted facilities/units:

The one (1) Electric Infrared powder coating oven, which is part of the 3-stage curing oven used for the R-30 Color Coat liquid booth and the R-30 Powder Coat paint line.

The source has requested the following:

Hayes Lemmerz submitted a letter on November 20, 1998 to IDEM requesting the capacity to burn off paint from reject painted wheels using the two (2) heat treat furnaces, HTF-A and HTF-B. This was a temporary operation performed at the time the request was submitted, but is not currently being performed.

The source has increased the capacity of the following:

- (1) The paint booth, identified as R-30 Color Coat liquid booth, has increased from 360 wheels per hour painted to 800 wheels per hour on the basis that most of the wheels are painted twice (see calculations on page 1 of TSD Appendix A).
- (2) The natural gas fired chip dryer rating from 4.5 million Btu per hour to 5.2 million Btu per hour.
- (3) Melt Furnace #1: from 5.3 million Btu per hour to 11 million Btu per hour and from a combined maximum capacity of 4000 pounds of aluminum per hour with Melt Furnace #2 to 3500 pounds of aluminum per hour capacity.
- (4) Melt Furnace #2: from 5.3 million Btu per hour to 12 million Btu per hour and from a combined maximum capacity of 4000 pounds of aluminum per hour with Melt Furnace #1 to 3500 pounds of aluminum per hour capacity.
- (5) Melt Furnace #3: from 5.5 million Btu per hour to 9.2 million Btu per hour.
- (6) Carousel Furnace #5: from 2.6 million Btu per hour to 3 million Btu per hour and from a maximum capacity of 1500 pounds of aluminum per hour to 2500 pounds of aluminum per hour.

#### **Alternative Operating Scenarios**

The source has also requested the following alternative operating scenarios:

- (a) The ability of Sidewell Furnace #4 to melt in-house process aluminum scrap, at the same listed capacities as Sidewell Furnace #5--only as a backup for periods when Melt Furnace #5/Sidewell Furnace #5 is not operational due to breakdown or failure.
- (b) The maximum design throughput capacity of dried chips from the pneumatic handling system for the thermal chip dryer that is being fed to the furnaces is 3600 pounds per hour. The source requests that they be allowed a maximum throughput capacity of 6000 pounds per hour of chips to account for times when there is a surplus of dried chips that are backlogged and have not been fed to the furnaces.

#### **Insignificant Activities**

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten (10) million Btu per hour.
  - (1) One (1) Dry-Off oven for the R-30 powder and liquid coating lines, with a maximum heat input capacity of 1.43 million Btu per hour, exhausting to one (1) stack, identified as S-11.
  - (2) One (1) 3-stage Curing oven used for the R-30 Color Coat liquid booth and the R-30 Powder Coat paint line, consisting of: one (1) 2-stage Powder Paint cure oven with a maximum heat input capacity of 2.87 million Btu per hour and one (1) Electric Infrared powder coating oven, with a maximum throughput capacity of 800 wheels per hour, exhausting to three (3) stacks, identified as S-12, S-13 and S-14.
  - One (1) Paint Hook Stripping oven, associated with the R-30 Powder Coat paint line, with a maximum heat input capacity of 0.35 million Btu per hour, exhausting to one (1) stack, identified as S-21. [326 IAC 4-2-2]
  - (4) One (1) Heat Treat furnace, identified as HTF-A, with a maximum heat input capacity of 8 million Btu per hour, exhausting to six (6) stacks, identified as S15, S-16, S-17, S-18, S-19 and S-20.
  - (5) One (1) Heat Treat furnace, identified as HTF-B, with a maximum heat input capacity of 6 million Btu per hour, exhausting to six (6) stacks, identified as S-26, S-45, S-46, S-47, S-48 and S-49.
  - (6) One (1) paint line, identified as the R-40 Powder Clear Coat paint line, with:
    - \* One (1) Pretreat Line Stage #2 burner, with a maximum heat input capacity of 2.07 million Btu per hour, exhausting to one (1) stack, identified as S-34.
    - One (1) Pretreat Line Stage #3 burner, with a maximum heat input capacity of 1.38 million Btu per hour, exhausting to one (1) stack, identified as S-35.
    - \* One (1) Pretreat Line Stage #8 burner, with a maximum heat input capacity of 0.325 million Btu per hour, exhausting to one (1) stack, identified as S-36.
    - \* One (1) Dryoff Zone #1 oven, with a maximum heat input capacity of 0.838 million Btu per hour, exhausting to one (1) stack, identified as S-37.
    - \* One (1) Dryoff Zone #2 oven, with a maximum heat input capacity of 1.02 million Btu per hour, exhausting to one (1) stack, identified as S-38.
    - \* One (1) R-40 Cure oven, with a maximum heat input capacity of 2.78 million Btu per hour, exhausting to one (1) stack, identified as S-39.
  - One (1) Rim Heating oven, with a maximum heat input capacity of 0.4 million Btu per hour, exhausting to one (1) stack, identified as S-56.

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  - (8) One (1) mold coating/repair process with two (2) mold bake ovens, identified as Mold Bake oven North and Mold Bake oven South, each with a maximum heat input capacity of 1.2 million Btu per hour, resulting in fugitive emissions and exhausting indoors at points S-63 and S-64.
  - (9) One (1) natural gas-fired in-line heat treat furnace, identified as In-Line Heat Treat Furnace, with a maximum heat input capacity of 6.0 million Btu per hour, exhausting to one (1) stack designated as S-59. (Constructed in 2001)
  - (10) Six (6) electric low pressure aluminum wheel casting units, each with a maximum design throughput of 60 wheels per hour. (Constructed in 2001)
  - (b) Equipment powered by internal combustion engines of capacity equal to or less than 500,000 Btu per hour, except where total capacity of equipment operated by one stationary source exceeds 2,000,000 Btu/hour.
  - (c) Combustion source flame safety purging on startup.
  - (d) A petroleum fuel, other than gasoline, dispensing facility, having a storage capacity of less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.
  - (e) The following VOC and HAP storage containers:
    - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
    - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
  - (f) Equipment used exclusively for the following: filling drums, pails or other packaging containers with lubricating oil, waxes, and greases.
  - (g) Machining where an aqueous cutting coolant continuously floods the machining interface.
  - (h) The following equipment related to manufacturing activities not resulting in the emission of HAP's: brazing equipment, cutting torches, soldering equipment, welding equipment.
    - (1) One (1) Robotic auto welder station, used for two piece wheel operation, with a maximum capacity of two (2) pounds of wire per hour and six hundred eleven (611) pounds per hour of aluminum wheel rims and centers, exhausting to one (1) stack, identified as S-58. (Constructed in 1995; still at the source but currently not in operation) [326 IAC 6-3-2] (Covered under C.1)
  - (i) Activities associated with the treatment of wastewater streams with an oil and grease content less than or equal to 1% by volume.
    - (1) One (1) Waste Water Treatment consisting of three (3) tanks, with a maximum heat input capacity of 3 million Btu per hour, resulting in fugitive emissions.
  - Forced and induced draft cooling tower system not regulated under a NESHAP.
  - (k) Quenching operations used with heat treating processes.

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  - (l) Replacement or repair of electrostatic precipitators, bags in baghouses and filters in other air filtration equipment.
  - Heat exchanger cleaning and repair. (m)
  - (n) Process vessel degassing and cleaning to prepare for internal repairs.
  - (o) Paved and unpaved roads and parking lots with public access [326 IAC 6-4] [326 IAC 6-5]
  - (p) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
  - (q) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.
  - Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling (r) tower.
  - On-site fire and emergency response training approved by the department. (s)
  - (t) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring, buffing, polishing, abrasive blasting, pneumatic conveying, and woodworking operations.
    - (1) One (1) shotblasting room/booth, with a maximum capacity of 5376 pounds per hour, with one (1) baghouse for particulate matter control, exhausting to one (1) stack, identified as S-33. [326 IAC 6-3-2] (Covered under C.1)
  - (u) Filter or coalescer media changeout.
  - (v) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees Celsius.
  - (w) A laboratory as defined in 326 IAC 2-7-4(20)(C).
  - (x) Other activities or categories not previously identified:

Insignificant Thresholds: Activities with emissions equal to or less than thresholds require listing only. Lead (Pb) = 0.6 ton/year or 3.29 lbs/day Carbon Monoxide (CO) = 25 lbs/day Sulfur Dioxide = 5 lbs/hour or 25 lbs/day Particulate Matter (PM) = 5 lbs/hour or 25 lbs/day Nitrogen Oxides (NOX) = 5 lbs/hr or 25 lbs/day Volatile Organic Compounds (VOC) = 3 lbs/hr or 15 lbs/day

(1) Three (3) degassing/flux systems, identified as Degassing/Flux System #1, Degassing Flux System #2, and Degassing/Flux System #3, each with maximum throughput capacities of 40 ladles per shift. The larger ladles have a maximum capacity of 3600 pounds per hour and the smaller ladles have maximum capacities of 2000 pounds per hour (with potential PM10 emissions of 0.62 tons per year). DFS#1 exhausting to one (1) stack identified as S-51, DFS#2 exhausting to one (1) stack, identified as S-52, and DFS#3 exhausting to one (1) stack, identified as S-55.

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- (2) Propane is used as back-up fuel for all natural gas combustion sources.
- One (1) chip wringer that feeds into the natural gas fired thermal chip dryer at a rate of 3600 pounds of aluminum per hour.

#### **Existing Approvals**

The source has been operating under previous approvals including, but not limited to, the following:

- (1) Letter transferring permits from Aluminum Conversion, Inc. to Western Wheel, Huntington, issued on September 13, 1988.
- (2) OP No. 35-01-93-0174, issued on October 17, 1989.
- (3) RP No. 069-2096-00031, issued on April 21, 1992.
- (4) Name change from Western Wheel Huntington, Inc. to Hayes Wheels International, Inc., issued on February 23, 1993.
- (5) Exemption CP No. 069-2921-00031, issued on March 26, 1993.
- (6) CP No. 069-3011-00031, issued on November 19, 1993.
- (7) RP No. 069-3712-00031, issued on July 15, 1994.
- (8) CP No. 069-4665-00031, issued on October 26, 1995.
- (9) A069-5245-00031, an amendment to CP No. 069-4665-00031, issued on February 9, 1996.
- (10) Amendment to CP No. 069-4665-00031, issued on April 10, 1996.
- (11) Exemption No. 069-12740-00031, issued on October 25, 2000.
- (12) Exemption No. 069-13803-00031, issued on April 25, 2001.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

- (1) OP No. 35-01-93-0174, issued on October 17, 1989.
  - (a) Two (2) of the "three (3) natural gas-fired reverberatory "Melting" furnaces rated at 3000 pounds per hour each" were destroyed in a September 17, 1990 explosion. No enforcement action was pursued and the units were later permitted under a separate registration: RP No. 069-2096-00031, issued on April 21, 1992. The units were later replaced in October of 1990 (identified now as Melt Furnace #1 and Melt Furnace #2 currently with maximum capacities of 3500 pounds per hour) and rated at a combined maximum capacity of 4000 pounds per hour.
  - (b) The natural gas fired reverberatory "hand pour-two piece wheel casting" furnace was removed in 1998. It was replaced with an electric furnace which is used for research and development, identified as one (1) electric furnace, used for research and development, which was removed in April 2001.

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- (c) The "eight (8) electric resistance-"low pressure molding" holding furnaces" were all removed by 1992.
- (d) The "natural gas fired "Chip Remelt" furnace rated at 3000 pounds per hour" was removed in 1990.
- (e) The "aluminum chip dryer rated at 3000 pounds per hour with particulate emissions controlled by a wet scrubber" was removed in 1990 and later replaced by the one (1) natural gas fired chip dryer in CP No. 069-4665-00031, issued on October 26, 1995.
- (f) The "Devilbiss paint booth with overspray controlled by dry filters" was removed in 1994.
- (g) One (1) of the "two (2) rim heating ovens" was removed in 1992.
- (h) One (1) of the "two (2) age ovens" was removed in 1992. The other age oven was removed in 1994.
- (i) The "heat treat furnace" is now being referred to as the "Mold Coat oven North".
- (j) Two (2) of the "three (3) auto welders" were removed by 1992. The other auto welder was removed in 1998.
- (k) The "paint burn-off oven with afterburner control" is now being referred to as the "Paint Hook Stripping oven", associated with the R-30 Powder Coat paint line.
- (I) One (1) of the "two (2) chip wringers" was removed in 1995.
- (m) The "two (2) electrostatic powder coating booths" are now being referred to as "One (1) paint line, identified as the R-30 Powder Coat paint line, with two (2) booths, identified as Powder Coat paint booth North and Powder Coat paint booth South".
- (n) The "two (2) wheelabrator shotblasters, each with baghouse control" were removed in 2000. The third wheelabrator shotblaster was removed in December 2000.
- (n) The "three water based parts washers" are now being referred to as the "Waste Water Treatment".
- (2) CP No. 069-2096-00031, issued on April 21, 1992.
  - (a) the "one (1) refurbished aluminum hand-poured furnace (HPF-1)..." is now being referred to as "Carousel Holding Furnace #5".
- (3) Exemption CP No. 069-2921-00031, issued on March 26, 1993.
  - (a) The "dryoff oven with five natural gas-fired burners" are now being referred to as the following:
    - \* One (1) Pretreat Line Stage #2 burner, with a maximum capacity of 2.07 million Btu per hour, exhausting to one (1) stack, identified as S-34.
    - \* One (1) Pretreat Line Stage #3 burner, with a maximum capacity of 1.38 million Btu per hour, exhausting to one (1) stack, identified as S-35.
    - \* One (1) Pretreat Line Stage #8 burner, with a maximum capacity of 0.325 million Btu per hour, exhausting to one (1) stack, identified as S-36.
    - \* One (1) Dryoff Zone #1 oven, with a maximum capacity of 0.838 million Btu per hour, exhausting to one (1) stack, identified as S-37.
    - \* One (1) Dryoff Zone #2 oven, with a maximum capacity of 1.02 million Btu per hour, exhausting to one (1) stack, identified as S-38.

- (4) CP No. 069-3011-00031, issued on November 19, 1993.
  - (a) The "one (1) wet paint booth" is now being referred to as "one (1) paint booth, identified as R-30 Color Coat liquid booth".
  - (b) The R-30 Color Coat liquid booth has increased production from a previously permitted level of 360 wheels painted per hour to 800 wheels painted per hour. The gallons of material painted per unit as submitted in the application for CP No. 069-3011-00031, issued on November 19, 1993, is 0.023 whereas, the gallons of material painted per unit as submitted in the Title V application is 0.0083. This actually shows a decrease in potential emissions for VOCs and PM even though there is an increase in production, which the source has stated is only due to the wheels being painted twice through the process. The gallons of material per part has been adjusted accordingly and seems to only be a descriptive change with respect to the increase in production. See calculations on page 1 of TSD App A.
- (5) RP No. 069-3712-00031, issued on July 15, 1994.
  - (a) The "one (1) 0.4 million Btu per hour natural gas fired rim heating oven" was one (1) of the two (2) rim heating ovens previously mentioned in OP No. 35-01-93-0174, issued on October 17, 1989. It is now being referred to as "one (1) Rim Heating oven, with a maximum capacity of 0.4 million Btu per hour, exhausting to one (1) stack, identified as S-56".
  - (b) One (1) of the "two (2) automatic welders" was removed in June 1999. The other welder was removed in April 2001.
- (6) CP No. 069-4665-00031, issued on October 26, 1995.
  - (a) The "four Hess auto welder stations (MIG), each with a maximum capacity of two (2) pounds of wire per hour and 550 pounds per hour of aluminum wheel rims and centers, exhausting through one (1) stack, referred to as S-57" were removed in 1998.
  - (b) The production limitation is equivalent to 2.7 pounds per hour of VOC emissions of the input coolant on the aluminum chips to the chip dryer. This has been changed to twelve (12) tons of VOC per twelve (12) consecutive month period due to the fact that 8-1-6 is in tons per year and the previous 2.7 is in pounds per hour.
- (7) Amendment to CP No. 069-4665-00031, issued on April 10, 1996.

Condition number 6 which states that:

(a) The particulate matter emissions shall be limited as follows:

The particulate matter emissions from the chip dryer shall not exceed 3.6 pounds per hour:

The particulate matter emissions from Melt Furnace #5 exhausting to S-54 shall not exceed 1.0 pounds per hour;

The particulate matter emissions from Melt Furnace #5 to S-53 shall not exceed 0.16 pounds per hour;

The particulate matter emissions from the welding operations shall not exceed 0.77 pounds per hour.

(b) The particulate matter emissions less than 10 microns (PM10) emissions shall be limited as follows:

The PM10 emissions from the chip dryer shall not exceed 0.37 pounds per hour; The PM10 emissions from Melt Furnace #5 exhausting to S-54 shall not exceed 0.82 pounds per hour;

The PM10 emissions from Melt Furnace #5 exhausting to S-53 shall not exceed 0.09

pounds per hour;

The PM10 emissions from the welding operations shall not exceed 0.77 pounds per hour.

Condition number 6 has not been incorporated in this Title V permit. The limits were based on Hayes Lemmerz being considered one of the 28 listed source categories (secondary metal facility) which would then make the PSD significant level 100 tons per year. The Amendment to CP No. 069-4665-00031, issued on April 10, 1996 determined that the emission units listed in CP No. 069-4665-00031, issued on October 26, 1995 were a minor modification to a major source.

At this time, it has been determined that Hayes Lemmerz is NOT a secondary metal facility for the purposes of PSD. This determination is based on EPA guidance memo dated December 4, 1998. Because Hayes Lemmerz uses clean ingots and in-house returns (painted wheels, scraps, gates, risers) only and does not use post-consumer scrap or scrap obtained from any other sources, it is considered to be die casting operation and not one of the 28 listed source categories. In addition, Hayes Lemmerz produces a marketable aluminum part/product (ie-wheels). The process requires less cleaning and pretreatment steps and uses less flux than is typical of a secondary metal facility. This makes the PSD significant level 250 tons per year instead of 100 tons per year as was previously thought when the above condition number 6 was written.

Although Hayes Lemmerz is not considered to be one of the 28 listed source categories (secondary metal facility) for PSD purposes, they do own and operate a thermal chip dryer, which makes the source and all applicable emission units subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Secondary Aluminum Production, 40 CFR 63.1500, Subpart RRR.

CP No. 069-4665-00031, also used an emission factor of 0.19 pounds per ton of aluminum for Melt Furnace #5 and Sidewell Furnace #5. The source did perform a stack test for these furnaces on August 27-28, 1996. The emission rates from that test will be used at this time for calculation purposes and applied for all the furnaces. Stack testing and/or retesting for PM will be required for all the furnaces as per this Title V as well as VOC testing for the thermal chip dryer. The NESHAP also requires HCl, THF, and D/F testing for the furnaces and thermal chip dryer (see Testing Requirements section).

#### **Enforcement Issue**

- (a) IDEM is aware that equipment has been modified prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.
- (c) A proper permit was not obtained for the increase in capacity of paint booth identified as R-30 and for melting furnaces identified as 1 and 2.

#### Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 10, 1996.

A notice of completeness letter was mailed to the source on February 3, 1997.

#### **Emission Calculations**

See Appendix A of this document for detailed emissions calculations.

### **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	Potential to Emit (tons/year)
PM	greater than 250
PM-10	greater than 250
SO <sub>2</sub>	less than 100
VOC	greater than 100, less than 250
CO	less than 100
NOx	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emit (tons/year)
Glycol Ethers	greater than 10
HAP's from combustion	less than 10
Chlorine	greater than 10
TOTAL	greater than 25

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOCs, PM/PM10 are equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

#### **Actual Emissions**

The following table shows the actual emissions from the source. This information reflects the 1996 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	373
PM-10	373
SO <sub>2</sub>	98
VOC	79
СО	5
NOx	41
Xylene	N/A
Chromium	N/A
Nickel	N/A
Glycol Ethers	N/A

#### Potential to Emit After Issuance

The source does not have any emission units which have limited potential to emit.

## **County Attainment Status**

The source is located in Huntington County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
СО	attainment
Lead	attainment

- (a) Volatile organic compounds (VOCs) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO<sub>x</sub> emissions are considered when evaluating the rule applicability relating to the ozone standards. Huntington County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Huntington County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
  Since this type of operation is not one of the 28 listed source categories under 326 IAC 22 and since there are no applicable New Source Performance Standards that were in
  effect on August 7, 1980, the fugitive emissions are not counted toward determination of
  PSD and Emission Offset applicability.

### **Part 70 Permit Conditions**

This source is subject to the requirements of 326 IAC 2-7, pursuant to which the source has to meet the following:

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- (a) Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of issuance of Part 70 permits.
- (b) Monitoring and related record keeping requirements which assume that all reasonable information is provided to evaluate continuous compliance with the applicable requirements.

# Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) The natural gas fired thermal chip dryer, Carousel Holding Furnaces #1-#6, Melt Furnaces #1-#5, and Sidewell Furnaces #4-#5 are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 63.1500, Subpart RRR). The provisions of 40 CFR Part 63, Subpart A General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart RRR.

# State Rule Applicability - Entire Source

# 326 IAC 2-4.1 (New Source Toxics Control)

This source was constructed prior to July 27, 1997. Two exemptions have been issued after this date but are not subject since the single and combination HAP emissions from the exemptions have been below the thresholds required to trigger 326 IAC 2-4.1.

#### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year) of VOCs and PM/PM10. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

# 326 IAC 5-1 (Opacity)

Pursuant to 326 IAC 5-1-2 (Opacity), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%), in any one (1) six (6) minute averaging period as determined by 326 IAC 5-1-4,
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

## 326 IAC 6-4 (Fugitive Dust Emissions)

Pursuant to 326 IAC 6-4 (Fugitive Dust Emissions), the Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4. Rule 326 IAC 6-4-2(4) regarding visible dust is not federally enforceable.

## State Rule Applicability - Individual Facilities

### 326 IAC 2-2 (PSD Rules)

- (a) This source is a major source for PM/PM-10 because the total source potential to emit (PTE) PM/PM-10 is greater than 250 tons per year.
  - (1) Prior to 1995, the significant emission units were constructed at separate times and each have a PM/PM-10 PTE of less than 250 tons per year, therefore 326 IAC 2-2 does not apply. At that time, the PM PTE for the source was less than 250 tons per year.
  - (2) After the addition of CP No. 069-4665-00031, issued on October 26, 1995, the total source PTE for PM was greater than 250 tons per year. Pursuant to CP No. 069-4665-00031, issued on October 26, 1995, the PM from the thermal chip dryer shall be limited to 6.08 pounds per hour, which is equivalent to a PM PTE of 26.63 tons per year which is less than 250 tons per year, therefore, 326 IAC 2-2 does not apply.
- (b) The total source potential to emit VOCs is less than 250 tons per year, therefore 326 IAC 2-2 does not apply. Any change or modification which may increase the potential to emit VOCs to greater than 250 tons per year, from the equipment covered in this permit, shall require prior approval from IDEM, OAQ before such change may occur.
  - (1) Pursuant to CP No. 069-4665-00031, issued on October 26, 1995, the input coolant on the aluminum chips to the chip dryer shall be limited to 54 pounds per hour which is equivalent to 2.7 pounds per hour of VOC emissions or a VOC PTE of 11.83 tons per year, which is less than 250 tons per year.
  - (2) Pursuant to CP No. 069-3011-00031, issued on November 19, 1993, the VOC content in the surface coatings in the paint booth identified as R-30 Color Coat liquid booth shall be limited to 3.5 pounds of VOC per gallon of coating less water, which is equivalent to a VOC PTE of 101.79 tons per year which is less than 250 tons per year.
  - (3) The remaining significant emission units were constructed at separate times and each have a VOC PTE of less than 250 tons per year, therefore, 326 IAC 2-2 does not apply.
- (c) The total source potential to emit for all other criteria pollutants is less than 250 tons per year, therefore 326 IAC 2-2 does not apply. Any change or modification which may increase the potential to emit CO, SOx, NOx to greater than 250 tons per year, from the equipment covered in this permit, shall require prior approval from IDEQ, OAQ before such change may occur.

## 326 IAC 4-2-2 (Incinerators)

Pursuant to 326 IAC 4-2-2, the paint hook stripping oven shall:

- (1) consist of primary and secondary chambers or the equivalent;
- (2) be equipped with a primary burner unless burning wood products;
- (3) comply with 326 IAC 5-1 and 326 IAC 2;
- (4) be maintained properly as specified by the manufacturer and approved by the commissioner:
- (5) be operated according to the manufacturer's recommendations and only burn waste approved by the commissioner;

- (6) comply with other state and/or local rules or ordinances regarding installation and operation of incinerators;
- (7) be operated so that emissions of hazardous material including, but not limited to, viable pathogenic bacteria, dangerous chemicals or gases, or noxious odors are prevented;
- (8) not emit particulate matter in excess of:
  - (A) incinerators with a maximum refuse-burning capacity of two hundred (200) or more pounds per hour: three-tenths (0.3) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; or
  - (B) all other incinerators: five-tenths (0.5) pounds of particulate matter per one thousand (1,000) pounds of dry exhaust gas at standard conditions corrected to fifty percent (50%) excess air; and
- (9) not create a nuisance or a fire hazard.

If any of the above result, the burning shall be terminated immediately.

## 326 IAC 6-3-2 (Particulate Matter)

(a) The particulate matter (PM) from the paint booth identified as R-30 Color Coat liquid booth shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where  $E =$  rate of emission in pounds per hour and  $P =$  process weight rate in tons per hour

The dry filters shall be in operation at all times the paint booth identified as R-30 Color Coat liquid booth is in operation, in order to comply with this limit.

(b) Pursuant to CP No. 069-4665-00031, issued on October 26, 1995, (A069-5245-00031, issued on February 9, 1996) and 326 IAC 6-3, the allowable particulate matter (PM) emissions from the natural gas fired thermal chip dryer shall not exceed 6.08 pounds per hour when operating at a process weight rate of 1.80 tons per hour.

The pound per hour limitation was calculated with the following equation. Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$
 where  $E =$  rate of emission in pounds per hour and  $P =$  process weight rate in tons per hour

 $P = 3600 \text{ lbs/hr} \times 1 \text{ ton/}2000 \text{ lbs}$ 

P = 1.80 tons per hour $E = 4.10 (1.80)^{0.67}$ 

E = 6.08 pounds per hour

The multicyclone shall be in operation at all times the natural gas fired thermal chip dryer is in operation, in order to comply with this limit.

(c) Pursuant to CP No. 069-4665-00031, issued on October 26, 1995, (A069-5245-00031, issued on February 9, 1996) and 326 IAC 6-3, the allowable PM emissions from Melt Furnace #5 shall not exceed 6.52 pounds per hour when operating at a process weight rate of 2.00 tons per hour. Pursuant to 326 IAC 6-3-2, the allowable PM emissions from Melt Furnace #4 shall not exceed 6.52 pounds per hour when operating at a process weight rate of 2.00 tons per hour.

The pound per hour limitation was calculated with the following equation. Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour:

```
E = 4.10 P^{0.67} where E = rate of emission in pounds per hour and P = process weight rate in tons per hour
```

 $P = 4000 \text{ lbs/hr} \times 1 \text{ ton/2000 lbs}$ 

P = 2.00 tons per hour  $E = 4.10 (2.00)^{0.67}$ E = 6.52 pounds per hour

The multicyclone shall be in operation at all times the natural gas fired thermal chip dryer is in operation, in order to comply with this limit.

(d) Pursuant to CP No. 069-4665-00031, issued on October 26, 1995, (A069-5245-00031, issued on February 9, 1996) and 326 IAC 6-3, the allowable PM emissions from Sidewell Furnace #5 shall not exceed 3.38 pounds per hour when operating at a process weight rate of 0.75 tons per hour. Pursuant to 326 IAC 6-3, the allowable PM emissions from Sidewell Furnace #4 shall not exceed 3.38 pounds per hour when operating at a process weight rate of 0.75 tons per hour.

The pound per hour limitation was calculated with the following equation. Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour:

$$E = 4.10 P^{0.67}$$
 where  $E =$  rate of emission in pounds per hour and  $P =$  process weight rate in tons per hour

 $P = 1500 \text{ lbs/hr} \times 1 \text{ ton/2000 lbs}$ 

P = 0.75 tons per hour  $E = 4.10 (0.75)^{0.67}$ E = 3.38 pounds per hour

The multicyclone shall be in operation at all times the natural gas fired chip dryer is in operation, in order to comply with this limit.

(e) The particulate matter (PM) emissions from the sandblasting room/booth shall not exceed 7.95 pounds per hour when operating at a process weight rate of 2.69 tons per hour.

The pound per hour limitation was calculated with the following equation. Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where  $E =$  rate of emission in pounds per hour and  $P =$  process weight rate in tons per hour

 $P = 5376 \text{ lbs/hr} \times 1 \text{ ton/2000 lbs}$ 

P = 2.688 tons per hour $E = 4.10 (2.688)^{0.67}$ 

E = 7.95 pounds per hour

The baghouse shall be in operation at all times the sandblasting room/booth is in operation, in order to comply with this limit.

(g) Pursuant to 326 IAC 6-3-2, the particulate matter emission limitations for the following facilities are as follows:

Facility	Process Weight Rate (pounds/hour)	Allowable PM (pounds/hour)	Potential PM (pounds/hour)
Carousel Holding Furnace #1	1000	2.58	0.60
Carousel Holding Furnace #2	1500	3.38	0.90
Carousel Holding Furnace #3	1500	3.38	0.90
Carousel Holding Furnace #4	1500	3.38	0.90
Carousel Holding Furnace #5	2500	4.76	1.50
Carousel Holding Furnace #6	2500	4.76	1.50
Melt Furnace #1	3500	5.96	1.40
Melt Furnace #2	3500	5.96	1.40
Melt Furnace #3	3000	5.38	1.40

As shown in the above table, all facilities comply with the requirements of this rule.

## 326 IAC 8-1-6 (General Reduction Requirements for New Facilities)

Pursuant to CP No. 069-4665-00031, issued on October 26, 1995, the input coolant on the aluminum chips to the natural gas fired chip dryer shall be limited to 54 pounds per hour. This production limitation is equivalent to twelve (12) tons of VOC per twelve (12) consecutive month period, which is less than 25 tons per year, therefore, 326 IAC 8-1-6, will not apply. Since there have been no modifications made to the thermal chip dryer, the limited potential to emit VOCs for this chip dryer will remain the same.

3600 lbs/hr Aluminum chips (maximum) \* 1.5% aqueous coolant solution = 54 lb/hr

the aqueous coolant solution is 5 parts coolant to 95 parts water

$$VOC_{\text{output}} = \frac{3600 \text{ lbs chips}}{\text{hour}} \times \frac{0.015 \text{ pounds solution}}{\text{lbs chips}} \times \frac{5 \text{ parts coolant}}{100 \text{ parts solution}}$$

$$VOC_{\text{output}} = 2.70 \text{ pounds coolant (VOC) per hour}$$

$$2.70 \frac{\text{lbs VOC}}{\text{hr}} \times \frac{1 \text{ ton } \times 8760 \text{ hours}}{1 \text{ year}} = 12 \text{ tons per year } = 1 \text{ ton per month}$$

The source has chosen to demonstrate compliance with 326 IAC 8-1-6 by limiting the input amount of coolant on the chips being fed into the thermal chip dryer rather than by use of the afterburner furnace as VOC control. Since the source is able to comply with the above VOC input limit and the afterburner furnace is being used for fire safety, use of the afterburner furnace for additional VOC control is voluntary and therefore, the afterburner furnace is not subject to any additional monitoring, record keeping or reporting requirements.

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to CP No. 069-3011-00031, issued on November 19, 1993 and 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the paint booth identified as R-30 Color Coat liquid booth was constructed after January 1, 1980 and has potential emissions greater than twenty-five (25) tons per year of VOCs, therefore, 326 IAC 8-2-9, is applicable.

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Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), no owner or operator of a facility engaged in the surface coating of aluminum wheels may cause, allow, or permit the discharge into the atmosphere of any VOCs in excess of 3.5 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator, for forced warm air dried coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made (See Appendix A pages 1 and 2), the paint booth identified as R-30 Color Coat liquid booth is in compliance with this requirement using a daily volume weighted average.

## **Testing Requirements**

(a) Within 180 days of permit issuance, the Permittee shall test the following emission units as shown in the table below utilizing methods as approved by the Commissioner. These tests shall be repeated at least every 2.5 years from the date of this valid compliance demonstration. These tests shall be conducted in accordance with Section C - Performance testing and 40 CFR 63.1512. When testing, all associated emission units exhausting to a single stack must all be operating when determining compliance with the limit and must be operated at 95% or more of their maximum design capacities.

Facilities to be tested	Pollutants to test
multicyclone to stack 53 for the thermal chip dryer and Sidewell Furnaces #4 and #5	PM/PM10*
Melt Furnaces #1-#5, Sidewell Furnaces #4 and #5, Carousel Furnaces #1-#6	PM, HCl, and D/F
thermal chip dryer	THC, D/F, VOC , PM/PM10*

<sup>\*(</sup>includes filterable and condensible PM10)

- (b) The owner or operator of the thermal chip dryer, Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4, Sidewell Furnace #5, Melt Furnaces #1, 2 and 3 and Carousel Furnaces #1-#6 is subject to the performance test/compliance demonstration general requirements and procedures as listed in 40 CFR 63.1511.
- (c) The owner or operator of a thermal chip dryer must:
  - (1) Pursuant to 40 CFR 63.1512(b), conduct a performance test to measure THC and D/F emissions at the outlet of the control device while the unit processes only unpainted aluminum chips.
  - (2) Pursuant to 40 CFR 63.1512(k), measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the thermal chip dryer instead of the feed/charge weight.
  - (3) Pursuant to 40 CFR 63.1512(s), submit the information described in 40 CFR 63.1515(b)(2) as part of the notification of compliance status report to document compliance with the operational standard in 40 CFR 63.1506(c).

(d) The owner or operator of Sidewell Furnace #4 and Sidewell Furnace #5 must:

- (1) Pursuant to 40 CFR 63.1512(d)(4), conduct performance tests to measure emissions of PM and D/F at the outlet of the control device and emissions of HCl at the outlet (for the emission limit) or the inlet and the outlet (for the percent reduction standard).
- (2) Pursuant to 40 CFR 63.1512(s), submit the information described in 40 CFR 63.1515(b)(2) as part of the notification of compliance status report to document compliance with the operational standard in 40 CFR 63.1506(c).
- (e) Pursuant to 40 CFR 63.1512(e) and the site specific monitoring plan required by 40 CFR 63.1510(o), the owner or operator of Melt Furnaces #1, 2 and 3, Carousel Furnaces #1-#6, Melt Furnace #4 and Melt Furnace #5 must include data and information demonstrating compliance with the applicable emission limits below:
  - (1) If Melt Furnace #4 and/or Melt Furnace #5 processes material other than clean charge, the owner or operator must conduct emission tests to measure emissions of PM, HCl, and D/F at the furnace exhaust outlet.
  - (2) If Melt Furnace #4 and/or Melt Furnace #5 processes only clean charge, the owner or operator must conduct emission tests to simultaneously measure emissions of PM and HCl at the furnace exhaust outlet. A D/F test is not required. Each test must be conducted while the melt furnaces process only clean charge.
  - (3) The owner or operator may choose to determine the rate of reactive flux added to the melt furnaces and assume, for the purposes of demonstrating compliance with the emission limits, that all reactive flux added to the melt furnaces is emitted. Under these circumstances, the owner or operator is not required to conduct an emission test for HCI.
- (f) Pursuant to 40 CFR 63.1512(j), the owner or operator of Melt Furnaces #1, 2 and 3, Carousel Furnaces #1-#6, Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5 must conduct performance tests as described in this section. The results of the performance tests are used to establish emission rates in lb/ton of feed/charge for PM and HCl and Fg TEQ/Mg of feed/charge for D/F emissions from each emission unit. These emission rates are used for compliance monitoring in the calculation of the 3-day, 24-hour rolling average emission rates using the equation in 40 CFR 63.1510(t). A performance test is required for each group 1 furnace processing only clean charge to measure emissions of PM and/or each group 1 furnace that processes scrap other than clean charge to measure emissions of PM and D/F and either:
  - (1) Emissions of HCI (for the emission limit) or
  - (2) The mass flow rate of HCl at the inlet to and outlet from the control device (for the percent reduction standard)

Pursuant to 40 CFR 63.1512(k), during the emission test(s) conducted to determine (g) compliance with emission limits in a kg/Mg (lb/ton) format, the owner or operator of Melt Furnaces #1, 2 and 3, Carousel Furnaces #1-#6, Melt Furnace #4, Melt Furnace #5, Sidewell Furnace #4 and Sidewell Furnace #5, subject to an emission limit in a kg/Mg (lb/ton) of feed/charge format must measure (or otherwise determine) and record the total weight of feed/charge to the affected source or emission unit for each of the three test runs and calculate and record the total weight. An owner or operator that chooses to demonstrate compliance on the basis of the aluminum production weight must measure the weight of aluminum produced by the thermal chip dryer instead of the feed/charge weight.

- (h) Pursuant to 40 CFR 63.1512(o), the owner or operator of Melt Furnace #4, Melt Furnace #5. Sidewell Furnace #4 and Sidewell Furnace #5, must use these procedures to establish an operating parameter value or range for the total reactive chlorine flux injection rate.
  - Continuously measure and record the weight of gaseous or liquid reactive flux (1) injected for each 15 minute period during hte HCl and D/F tests, determine and record the 15-minute block average weights, and calculate and record the total weight of the gaseous or liquid reactive flux for the 3 test runs;
  - (2) Record the identity, composition, and total weight of each addition of solid reactive flux for the 3 test runs;
  - (3)Determine the total reactive chlorine flux injection rate by adding the recorded measurement of the total weight of chlorine in the gaseous or liquid reactive flux injected and the total weight of chlorine in the solid reactive flux using the following equation:

 $W_1 = F_1W_1 + F_2W_2$ 

W<sub>t</sub> = total chlorine usage, by weight

 $F_1$  = fraction of gaseous or liquid flux that is chlorine

 $W_1$  = weight of reactive flux gas injected;

 $F_2$  = fraction of solid reactive chloride flux that is chlorine

(e.g., F = 0.75 for magnesium chloride); and

 $W_2$  = weight of solid reactive flux;

- (4) Divide the weight of total chlorine usage (W<sub>t</sub>) for the 3 test runs; and
- If a solid reactive flux other than magnesium chloride is used, the owner or (5)operator must derive the appropriate proportion factor subject to approval by IDEM, OAQ.

## **Compliance Requirements**

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

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Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

- (a) The one (1) paint booth identified as R-30 Color Coat liquid booth has applicable compliance monitoring conditions as specified below:
  - (1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
  - (2) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other noticeable change in overspray emissions is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.
  - (3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.
- (b) The natural gas fired thermal chip dryer, Carousel Holding Furnaces #1-#6, Melt Furnaces #1-#5, and Sidewell Furnaces #4-#5 have applicable compliance monitoring conditions as specified below:
  - (1) Daily visible emission notations of the Sidewell Furnaces #4-#5, thermal chip dryer/multicyclone stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

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  - (2) The Permittee shall record the total static pressure drop across the multicyclone used in conjunction with the thermal chip dryer/Sidewell Furnaces #4-#5, at least once per shift when the thermal chip dryer/Sidewell Furnaces #4-#5 are in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 3.0 and 6.0 inches of water or a range established during the latest stack test. The instrument used for determining the pressure shall comply with Section C Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.
  - (3) An inspection shall be performed each calender quarter of the multicyclone controlling the thermal chip dryer/Sidewell Furnaces #4-#5 when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.
  - (4) In the event that multicyclone failure has been observed: Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B Emergency Provisions).
  - (5) Pursuant to 40 CFR 63.1510(b), the owner or operator must prepare and implement for the thermal chip dryer, Carousel Holding Furnaces #1-#6, Melt Furnaces #1-#5, and Sidewell Furnaces #4-#5 a written operation, maintenance and monitoring (OM&M) plan. Any subsequent changes to the plan must be submitted to the applicable permitting authority for review and approval. Pending approval by the applicable permitting authority of an initial or amended plan, the owner or operator must comply with the provisions of the submitted plan.
  - (6) The natural gas fired thermal chip dryer, Carousel Holding Furnaces #1-#6, Melt Furnaces #1-#5, and Sidewell Furnaces #4-#5 must follow all applicable compliance monitoring conditions as specified in 40 CFR 63.1510.
  - (7) The Compliance Response Plan for the natural gas fired thermal chip dryer, Carousel Holding Furnaces #1-#6, Melt Furnaces #1-#5, and Sidewell Furnaces #4-#5 shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C Compliance Monitoring Plan Failure to Take Response Steps, shall be considered a violation of this permit.

# Conclusion

This operation that manufactures aluminum wheels for automobiles and light trucks shall be subject to the conditions of the attached proposed **Part 70 Permit No. T069-7421-00031**.

Company Name: Hayes Wheels International-Indiana, Inc.

Plant Location: 1870 Riverfork Drive, Huntington, Indiana 46750

County: Huntington
Permit Reviewer: Felicity L. Lao
Title V #: 069-7421

Title V #: 069-7421 Plt. ID #: 069-00031

\* \* Process Emissions \* \*

Process:		Rate	Pollutant	Ef	Ebc	Eac	Type of contro Control Efficiency
		(tons Al/hr)		(lb/ton produce	(ton/yr)	(ton/yr)	(%)
Melting	each	1.75	PM	0.43	3.28	3.28	none
Two (2) NG fire	ed		PM-10	0.43	3.28	3.28	
reverberatory f	urnace		SO2	0.00	0.00	0.00	
(Melt Furnace	#1)		NOx	0.00	0.00	0.00	
(Melt Furnace	#2)		VOC	0.20	1.53	1.53	
			CO	0.00	0.00	0.00	
			Lead	0.00	0.00	0.00	

### Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

$$limit = 4.1 \times (1.75 \ ^{\circ}0.67) = 6.0 \ lb/hr$$
 (allowable)

# with potential:

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Process:	Rate (tons Al/hr)	Pollutant	Ef (lb/ton produc∈	Ebc (ton/yr)	Eac (ton/yr)	Type of contro Control Efficiency (%)
Melting	1.50	PM	0.43	2.81	2.81	none
One (1) NG fired		PM-10	0.43	2.81	2.81	
reverberatory furnace		SO2	0.00	0.00	0.00	
(Melt Furnace #3)		NOx	0.00	0.00	0.00	
		VOC	0.20	1.53	1.53	
		CO	0.00	0.00	0.00	
		Lead	0.00	0.00	0.00	

#### Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 1.5 tons/hr

 $limit = 4.1 \times (1.5 \, ^{\circ}0.67) = 5.4 \, lb/hr$  (allowable)

with potential:

2.8 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.6 lb/hr (will comply)

Process:		Rate	Pollutant	Ef	Ebc	Eac	Type of contro Control Efficiency
		(tons Al/hr)		(lb/ton produce	(ton/yr)	(ton/yr)	(%)
Melting	each	2.25	PM	0.43	4.22	4.22	none
One (1) NG fire	ed		PM-10	0.43	4.22	4.22	
reverberatory fu	urnace		SO2	0.00	0.00	0.00	
(Melt Furnace #	<del>4</del> 4)		NOx	0.00	0.00	0.00	
(Melt Furnace #	<del>4</del> 5)		VOC	0.20	1.53	1.53	
			CO	0.00	0.00	0.00	
			Lead	0.00	0.00	0.00	

### Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 2.25 tons/hr

 $limit = 4.1 \times (2.25 \, ^{\circ}0.67) = 7.1 \, lb/hr$  (allowable)

with potential:

4.2 tons/yr x 2000 lb/ton / 8760 hr/yr = 1.0 lb/hr (will comply)

Ef for PM/PM10 from Hayes Lemmerz' Compliance test dated 8/27 and 8/28/96: 0.385 lb/hr / (4500lb/hr / 2000 lb/ton) = 0.171 lb/ton \* 2.5 = .428 lb/ton = Ef

Process:		Rate	Pollutant	Ef	Ebc	Eac	Type of contro C	ontrol Efficier
		(tons Al/hr)		(lb/ton produce	(ton/yr)	(ton/yr)		(%)
Melting	each	0.75	PM	0.95	3.10	0.31	multicyclone	90
One (1) NG fire	ed		PM-10	0.95	3.10	0.31	multicyclone	90
sidewell furnac	ce		SO2	0.00	0.00	0.00		
(Sidewell Furna	ace #4)		NOx	0.00	0.00	0.00		
(Sidewell Furna	ace #5)		VOC	0.20	0.66	0.66		
			CO	0.00	0.00	0.00		
			Lead	0.00	0.00	0.00		

### Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

Ef for PM/PM10 from Hayes Lemmerz' Compliance test dated 8/27 and 8/28, 0.964 lb/hr / (5100lb/hr / 2000 lb/ton) = 0.171 lb/ton \* 2.5 = .945 lb/ton = Ef

Process:		Rate (tons Al/hr)	Pollutant	Ef (lb/ton produce	Ebc (ton/yr)	Eac (ton/yr)	Type of contro Control Efficiency (%)
Melting	each	0.75	PM	0.43	1.41	1.41	none
Three (3) NG	fired		PM-10	0.43	1.41	1.41	
Carousel Hold	ding Furnaces		SO2	0.00	0.00	0.00	
(Carousel Ho	lding Furnace #2	2)	NOx	0.00	0.00	0.00	
(Carousel Ho	lding Furnace #3	3)	VOC	0.20	0.66	0.66	
(Carousel Ho	lding Furnace #4	<b>1</b> )	CO	0.00	0.00	0.00	
			Lead	0.00	0.00	0.00	

### Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

 $P = 0.75 \ tons/hr \\ limit = 4.1 \ x \ ( 0.75 \ ^0.67 \ ) = 3.4 \ lb/hr \ (allowable)$  with potential:  $1.4 \ tons/yr \ x \qquad 2000 \ lb/ton \ / \qquad 8760 \ hr/yr = 0.3 \ lb/hr \ (will \ comply)$ 

Ef for PM/PM10 from Hayes Lemmerz' Compliance test dated 8/27 and 8/28/0.385 lb/hr / (4500lb/hr / 2000 lb/ton) = 0.171 lb/ton \* 2.5 = .428 lb/ton = Ef

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Process:	Rate	Pollutant	Ef	Ebc	Eac	Type of contro Control Efficiency
	(tons Al/hr)		(lb/ton produce	(ton/yr)	(ton/yr)	(%)
	0.50	PM	0.43	0.94	0.94	none
One (1) NG fired		PM-10	0.43	0.94	0.94	
Carousel Holding Furnace	е	SO2	0.00	0.00	0.00	
(Carousel Holding Furnac	ce #1)	NOx	0.00	0.00	0.00	
		VOC	0.20	0.44	0.44	
		CO	0.00	0.00	0.00	
		Lead	0.00	0.00	0.00	

#### Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 0.5 tons/hr

limit =  $4.1 \times (0.5^{\circ}0.67) = 2.6 \text{ lb/hr}$  (allowable)

with potential:

0.9 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.2 lb/hr (will comply)

Process:		Rate	Pollutant	Ef	Ebc	Eac	Type of contro Control Efficiency
		(tons Al/hr)		(lb/ton produce	(ton/yr)	(ton/yr)	(%)
ead	ch	1.25	PM	0.43	2.34	2.34	none
Two (2) NG fired			PM-10	0.43	2.34	2.34	
Carousel Holding Furnaces		SO2	0.00	0.00	0.00		
(Carousel Holding Furnace #5)		NOx	0.00	0.00	0.00		
(Carousel Holding Furnace #6)		VOC	0.20	1.10	1.10		
			CO	0.00	0.00	0.00	
			Lead	0.00	0.00	0.00	

### Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 1.25 tons/hr

 $limit = 4.1 \times (1.25 \ ^{\circ}0.67) = 4.8 \ lb/hr$  (allowable)

with potential:

2.3 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.5 lb/hr (will comply)

Ef for PM/PM10 from Hayes Lemmerz' Compliance test dated 8/27 and 8/28/96: 0.385 lb/hr / (4500lb/hr / 2000 lb/ton) = 0.171 lb/ton \* 2.5 = .428 lb/ton = Ef

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Process:	Rate	Pollutant	Ef	Ebc	Eac	Type of contro	Control Efficien
	(tons/hr)		(lb/ton produce	(ton/yr)	(ton/yr)		(%)
One (1) Shotblast	2.688	PM	17.00	200.15	0.40	baghouse	99.8%
Room/Booth		PM-10	1.70	0.00	0.00		
		SO2	0.00	0.00	0.00		
SCC# 3-04-003-40		NOx	0.00	0.00	0.00		
AP-42 Ch. 12.10		VOC	0.00	0.00	0.00		
		CO	0.00	0.00	0.00		

## Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 2.688 tons/hr

 $limit = 4.1 \times (2.688 \ ^{\circ}0.67) = 8.0 \ lb/hr$  (allowable)

with potential:

0.4 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.1 lb/hr (will comply)

Hayes Wheels International-Indiana, Inc.

Huntington, Indiana T069-7421-00031

Rate	Pollutant	Ef	Ebc	Eac	Type of contro C	ontrol Efficie
(tons Al/hr)		(lb/ton produce	(ton/yr)	(ton/yr)		(%)
1.80	PM	0.95	9.31	0.93	multicyclone	90
	PM-10	0.95	9.31	0.93	multicyclone	90
	SO2	0.00	0.00	0.00		
	NOx	0.00	0.00	0.00		
	(tons Al/hr)	(tons Al/hr) 1.80 PM PM-10 SO2	(tons Al/hr)         (lb/ton product           1.80         PM         0.95           PM-10         0.95           SO2         0.00	(tons Al/hr)         (lb/ton product (ton/yr)           1.80         PM         0.95         9.31           PM-10         0.95         9.31           SO2         0.00         0.00	(tons Al/hr)         (lb/ton product (ton/yr)         (ton/yr)         (ton/yr)           1.80         PM         0.95         9.31         0.93           PM-10         0.95         9.31         0.93           SO2         0.00         0.00         0.00	(tons Al/hr)         (lb/ton product (ton/yr)         (ton/yr)           1.80         PM         0.95         9.31         0.93         multicyclone           PM-10         0.95         9.31         0.93         multicyclone           SO2         0.00         0.00         0.00

VOC	0.20	1.53	1.53
CO	0.00	0.00	0.00
Lead	0.00	0.00	0.00

Allowable Emissions:

The following calculations determine PM compliance with 326 IAC 6-3-2 for process weight rates less than 30 tons per hour:

P= 1.8 tons/hr

limit =  $4.1 \times ($   $1.8 \cdot 0.67 ) = 6.1 \text{ lb/hr}$  (allowable)

with potential:

0.9 tons/yr x 2000 lb/ton / 8760 hr/yr = 0.2 lb/hr (will comply)

Ef for PM/PM10 from Hayes Lemmerz' Compliance test dated 8/27 and 8/28/96: 0.964 lb/hr / (5100lb/hr / 2000 lb/ton) = 0.171 lb/ton \* 2.5 = .945 lb/ton = Ef